

WILLIAM C. DRESSER, SBN 104375
LAW OFFICES OF WILLIAM C. DRESSER
14125 Capri Drive, Suite 4
Los Gatos, California 95032
Tel: (408) 279-7529
Fax: (408) 298-3306
Email: loofwcd@aol.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, ex rel.
GREGOR LESNIK; STJEPAN PAPES,

Plaintiffs,

vs.

EISENMANN SE, et al.

Defendants.

Case No.: 5:16-cv-01120-BLF

Declaration of William C. Dresser in Support
of Motion for Recovery of Fees to Plaintiff
Stjepan Papes on TVPRA claim and on FLSA
claims

Date: February 2, 2023
Time: 9:00 a.m.
Ct rm: 3, 5th Floor
Judge: Hon. Beth Labson Freeman

I, William C. Dresser, certify and declare as follows:

1. I am an attorney at law, duly authorized to practice in, among other venues, Northern District of California, before all the courts of the State of California, as well as federal courts in the Eastern District of California, the Central District of California, and the Ninth Circuit Court of Appeals, as well as many bankruptcy courts. I am counsel of record for Plaintiff Stjepan Papes.

2. I have personal knowledge of all facts stated in this declaration, and if called testify, I can and would testify competently thereto.

BASES OF REQUEST FOR FEES

3. This request for fees is made on behalf of prevailing party Plaintiff Stjepan Papes

1 for relief granted under the Second and Third Causes of Action (Fair Labor Standards Act
2 ("FLSA") claims, 29 U.S.C. § 216(b) ("shall, in addition to any judgment awarded to the
3 plaintiff or plaintiffs, allow a reasonable attorney's fee to be paid by the defendant, and
4 costs of the action.)) and under the Ninth Cause of Action (Trafficking and Coerced Labor
5 under TVPRA. 18 U.S.C. § 1595 ("and may recover damages and reasonable attorneys
6 fees").)

7
8 4. Plaintiff Papes commenced his individual requests for relief in the July 19, 2017
9 filed Second Amended Complaint which I filed in the within US District Court for the
10 Northern District of California action no. C16-1120-LHK entitled "United States of America,
11 ex rel. Gregor Lesnik, Stjepan Papes, Plaintiffs, vs. Eisenmann SE, et al."

12 5. The Coerced Labor claim for which there was an Order issued granting Judgment,
13 and the FLSA wage claims which is the subject of a pending motion, are stated both in the
14 July 19, 2017 filed Second Amended Complaint and in the October 31, 2018 filed "Third
15 Amended Complaint for Damages and Other Relief under the False Claims Act and Other
16 Claims Including Individual, Collective and Class Wages Claims, Individual and Class
17 Labor Trafficking Claims, and RICO Claims - Class Action."

18
19 6. The Court in granting Papes' motion for judgment under the coerced labor claims
20 had denied in that motion a request for fees. Papes by this motion provides the
21 information to regarding attorney's fees to support that award, both for the coerced labor
22 claim and for the FLSA claims. This includes a request of a specific amount of attorney's
23 fees, and this declaration stating the services rendered by each person for whom fees are
24 requested and a brief description of their relevant qualifications as is required by Civil
25 Local Rule 54-5(b)(2)-(3).
26
27
28

DOCUMENTATION OF SERVICES BY TIME, DATE, TASK, AND INDIVIDUAL

7. Documentation of the time spent on legal services identified by specific dates, tasks, duration and individuals is a report from a Timeslips billing program.

8. Time records are kept on a daily basis by each individual working for this office. Records are saved in a Word, and formerly in a WordPerfect, document saved by date. The daily records identify the client, include a brief statement or summary of the work performed, and the amount of time spent in tenths of an hour.

9. The data from the daily time sheets is then inputted into a Timeslips billing program.

10. Expense records are kept separately for internal copying and postage costs, and then inputted into the Timeslips billing program.

11. Expenses paid by check are saved in a Quicken program. Expenses paid by credit card are saved on a Word, and formerly a WordPerfect, document, typically on a monthly basis. This information is then inputted into the Timeslips billing program.

12. A History Report for Court is generated by the Timeslips program from this data.

13. Attached as Exhibit 751 to this Declaration is a "History Report for Court" as generated by Timeslips, the billing program used by this office, for entries through August 23, 2022.

14. Attached as Exhibit 752 to this Declaration is a "History Report for Court" as generated by Timeslips, the billing program used by this office, for entries for August 24 to September 29, 2022, being the work to prepare and complete this declaration and the concurrently filed motions and pleadings. Recovery as part of a lodestar amount is requested for the time spent to prepare the motion for fees. Recovery is not sought for other time listed in this recent History Report because I believe that time was due to

1 inefficiencies by me, and is not time that I would ordinarily bill a client for.

2 15. The initial billing entries for this case were on August 25, 2015, when I first
3 considered and evaluated a potential false claims act claim.

4 16. The initial billing entry for this case for which recovery is sought is on May 18,
5 2016, when I first communicated with Mr. Papes.

6 17. The History Report sets forth specific services rendered by me, and by all people
7 working in this office, in representation of Plaintiff Stjepan Papes in this case.

8 18. I have redacted from Exhibit 751 - the History Report through August 23, 2022 –
9 and removed from a request for fees entries for services and costs that were not spent in
10 prosecuting and seeking recovery on the causes of action for coerced labor claim and for
11 FLSA claims. I have redacted entries for False Claims Act claims, claims against
12 defendants who were never defendants on coerced labor or FLSA claims. I thus removed
13 service of process costs on numerous initially named defendants. I removed costs for
14 translations into Polish. I removed costs for service in Poland. This is a reduction in costs
15 for the translations and service on Polish entities alone of \$15,058.23. I also removed
16 fees paid to co-counsel who prepared motions for class certification and class judgment.
17 There are nine pages of mostly relatively short time entries for the services rendered prior
18 to the April 2017 USAG declination to intervene and the concurrent federal Labor
19 Commissioner ceasing to act for recovery of underpaid wages. Even then, some of the
20 time was attributed to things reasonable and necessary to obtain the relief sought by this
21 motion. For example, on page 10 there are entries for investigation and research of a
22 "new Vuzem front entity." This is HRID-Mont, d.o.o., opened to transfer contracts and
23 employees, and assets, from ISM Vuzem, d.o.o. This is an issue in the coerced labor and
24 FLSA claims.
25
26
27
28

1 19. The remaining History Report contains entries for services and costs spent or
2 incurred in investigation, client contact, research, and prosecution for recovery on the
3 coerced labor and FLSA claims.

4 20. The History Report does not contain time entries for services on the related actions
5 of Maslic et al v ISM Vuzem, d.o.o. et al, or Novoselec et al v ISM Vuzem, d.o.o. et al

6 21. The History Report does not contain time entries for services in representing
7 Gregor Lesnik in prior proceedings identified in paragraphs 2 to 4.

8 22. The redacted copy of the History Report does not contain time entries for
9 subsequent proceedings brought in Slovenia by Robert Vuzem and Ivan Vuzem – which
10 were dismissed by the Slovenian courts.

11 23. Exhibit 752 - the History Reporte for services rendered on and after August 24,
12 2022 – does not contain redactions.

13 24. Neither of the History Reports include for the time that will be required to obtain
14 collection on a Judgment issued in this Court.

15 25. All billed legal services by an attorney in this office on behalf of Plaintiff Stjepan
16 Papes in this case have been by me. I have sought and obtained legal advice and
17 assistance by other attorneys. No time entries in the redacted copy of the History Report
18 are for the services for other attorneys. There are costs entries in the Report for actual
19 payments by me to other attorneys on an hourly fee basis. Recovery for these payment
20 to other attorneys are not sought in this motion.

21 26. The total amount of fees stated in this Exhibit 751 History Report is \$1,054,773.18
22 for 3,338.35 hours of recorded time through August 23, 2022.

23 27. 1,900 hours of this time is by me. 1,000 hours of this time is by Debra Lumley.
24 200 hours of this time is by Stacie Del Giudice. 70 hours of this time is by Andrea
25

1 Anderson. The balance of the time is by law clerks and law students who worked for this
2 office.

3 28. Two-thirds of the time was spent was in services that support grant of judgment on
4 the coerced labor claims and the FLSA claims.

5 29. Three-quarters of the time spent on the coerced labor claims and the FLSA claims
6 for Stjepan Papes against the Vuzem parties.

7 30. I estimated that more than three-fourths of the time was efficiently performed and
8 was reasonably and necessarily incurred to obtain the results for prevailing party Stjepan
9 Papes under the TVPRA claim and the FLSA claims.

10 31. Pursuant to this Court's Standing Order Re Civil Case for Motions for Attorneys
11 Fees, this Declaration attaches as Exhibit 753 a Chart summarizing the hours expended
12 on the major tasks in the case for the TVPRA claims and for the FLSA claims,
13 respectively.

14 32. It also attaches as Exhibit 754 a Chart summarizing hours expended on major tak
15 for the FLSA claims. This Chart identifies time spent by me and my office staff on the
16 major tasks in the case for the FLSA claims.

17 **PRE-COMPLAINT SERVICES**

18 33. My first communications with Stjepan Papes was on May 18, 2016. I was at that
19 time obtaining information regarding both a False Claims Act claim that was being
20 considered by the Department of Justice and a wages claim that was to be pursued by the
21 federal Department of Labor.

22 34. I had prior to then obtained information in connection with representation of Gregor
23 Lesnik in Alameda County Superior Court action HG15773484 entitled "Gregor Lesnik,
24 Plaintiff, vs. ISM Vuzem USA, Inc., Vuzem USA, Inc., ISM Vuzem d.o.o., Valentino Doe 1,
25
26
27
28

1 and Does 2 through 50, inclusive, Defendants" including for a wages claims, in a related
2 workers compensation proceeding, and a False Claims Act claim in the within proceeding,
3 and in providing information to the Department of Labor for FLSA wages claims.

4 35. I, along with Gregor Lesnik, met in person on June 16, 2016 at the USAG's Office,
5 450 Golden Gate Avenue, San Francisco. We met with representatives from among other
6 institutions the USAG, Department of Homeland Security, Department of State Diplomatic
7 Security Office, and the United States Department of Labor, Wage and Hour Division. I
8 was specifically told at that meeting to do nothing, and to file no further pleadings on
9 behalf of Mr. Lesnik or any other affected individual so as to not draw any attention to the
10 government's investigation. I was specifically told that the government would investigate
11 this matter, would determine the extent that it would intervene, and would pursue a
12 wages-based claim on behalf of all affected workers who had not been paid.

13
14 36. I received a further call on June 17, 2016 from AUSAG Melanie Proctor directing
15 me to not pursue other claims including wages claims, that Michael Eastwood's office with
16 the U.S. Department of Labor, Wage and Hour Division, can and would handle the wages
17 claims, and that this was required so that it would not complicate what they are doing.

18
19 37. While the visa fraud claims were under seal, Plaintiffs could not pursue their wage
20 and hour claims through a separate complaint without risking revealing material that was
21 included in the sealed complaint.

22
23 38. Stjepan Papes began in the latter part of 2016 providing information to me to
24 support wage and hour claims. This included copies of bank deposits for pay, tax
25 documents, worker lists, photos of Vuzem worker days documents, names of co-workers,
26 contact information for co-workers, and identification of some significant employment
27 issues and discussions about them.

1 39. I received no information from the government about its investigation or analysis or
2 pending actions until April of 2017. I at that time was advised by the government, by then
3 Assistant United States Attorney General Melanie Proctor, that the government would not
4 intervene in the within action on the FCA claim. I had no advance notice of this intended
5 decision or decision. I was very surprised.

6 40. During that time period I was not told by the federal Department of Labor what it
7 was doing or not about wages-based claims for relief. I had made calls and sent e-mails in
8 that time period to every representative of the Department of Labor that I had
9 communicated with about this matter at any time prior to April of 2017. I had in March of
10 2017 provided additional information to a re-assigned investigator with the Wage and
11 Hour Division in connection with the wage claims. My last communication from the
12 Department of Labor was on June 12, 2017, in an e-mail stating that the District Director
13 would have the investigator assigned to this matter contact me. No one did.

14 41. I had since late 2016 had communications with and obtained information from
15 Stjepan Papes supporting wages claims that I had passed on to the federal Department of
16 Labor. I then in the summer of 2017 commenced further investigation and analysis of the
17 facts and potential claims including wages claims involved in this case.

18 42. I entered into a fee agreement with Stjepan Papes which he signed on June 17,
19 2017 and which I signed on June 18, 2017. This was after the federal Department of
20 Labor had ceased any responsive communications about wages claims and after the
21 United States stated an intention to not intervene in the FCA claims.

22 43. This was also after I conducted substantial analysis and evaluation of potential
23 claims on behalf of Mr. Papes.

24 44. I filed in the within US District Court for the Northern District of California action no.

1 C16-1120-LHK on July 19, 2017 a Second Amended Complaint for Damages and Other
2 Relief. This is the pleading which added claims for wages for Plaintiff Stjepan Papes.

3 45. I had in the year prior to filing in July of 2017 the Second Amended Complaint in
4 this case, and have in the five years thereafter, actively pursued claims for the benefit of
5 Stjepan Papes.

6 46. Mr. Papes was the initial and primary source of obtaining the information to create
7 a list, with names, contact information, and other information, of co-employees..

8 47. Mr. Papes provided copies of employment contracts, confidential company records
9 of workers hours, co-worker summaries of hours worked, Slovenian and Croatian tax
10 records, passports, visas, security cards for entries to work sites, witness statements,
11 social network posts, and payment summaries. Some of these documents Mr. Papes had
12 in his possession. Many of them he obtained from other co-workers and provided to me.
13

14 48. I expended literally a thousand hours developing the facts of this case by meeting
15 with, innumerable and lengthy telephone calls, skype calls, and e-mails with Stjepan
16 Papes and many other witnesses, written and oral communications with Mr. Papes' co-
17 employees, development of employee lists with address and contact information, and
18 other independent investigation. I have engaged in most of these communications with
19 the assistance of Elma Fazlic Dresser, Danijel Travancic, and occasionally others who are
20 fluent in both English and the Serbo-Croatian languages.
21

22 49. I conducted hundreds of hours in research and development of legal theories and
23 analysis. I spoke with many attorneys and other consultants about wage and hours
24 claims, including Odvetnik Marjan Aleksic, attorneys Hatixë Grbeshi, Michael Hancock,
25 James Kealy, Miriam Nemeth, Monique Olivier, Martina Vandenberg, Walter H. Walker,
26 III, and Christine Webber, and prior co-counsel herein on class claims Hunter Pyle, Tanya
27
28

1 Tambling, and Katherine V. Fiester.

2 50. This followed my investigation and work product efforts prior to June of 2016 in my
3 representation of Gregor Lesnik as an individual for personal injury claims based on a fall
4 while working for Vuzem persons at the Tesla jobsite.

5 51. I spent 88 hours in the pre-complaint investigation and preparation of the Second
6 Amended Complaint for the coerced labor claim and FLSA claim as reflected in the
7 unredacted portions of the History Report. Of those services not redacted, about 15
8 hours of the identified time for research and drafting the Second Amended Complaint was
9 not related to the coerced labor and FLSA claims. I thus identified 73 hours of my time on
10 the Chart for Fees under Compl. And Pre-Compl. Investigation.

11 52. A similar estimate is stated by me on the attached Chart for Fees for the FLSA
12 claims alone, both for this and for all major categories as discussed in this declaration.
13

14 **SERVICE OF PROCESS**

15 53. I conducted the long process of serving the Second Amended and the Third
16 Amended Complaints on the defendants. There were unique issues in this case because
17 the defendants against whom fees are sought included two active and then dissolved
18 corporations in multiple states, included a foreign entity that openly worked in the United
19 States then temporarily withdrew while working under a different name, and foreign
20 natural persons.
21

22 54. This office caused the Second Amended Complaint to be translated into Slovenian.
23

24 55. This office on behalf of Relators and Plaintiff Lesnik and Papes mailed waivers of
25 service to each of the defendants against whom default judgments are sought, initially as
26 to the Second Amended Complaint and later after its filing the Third Amended Complaint.

27 56. This office caused to be served on the defendants against whom default judgments
28

1 are sought the Second Amended Complaint. This includes locating and retaining
2 translators Link Translations, and Sandra Bozic, paying for and obtaining translations of
3 pleadings, investigation of individuals and entities including Odvetnik Luka Divjak, FOKUS
4 d.o.o., Process Service Network, and Process Server One that can and did serve the
5 defendants by permissible means in Croatia and Slovenia, and obtaining proofs of service
6 and filing the same as part of detailed requests for entries of default.

7
8 57. This office caused the Third Amended Complaint and an Order after Hearing to be
9 translated into Slovenian, by Ana Rostohar, who in her March 26, 2021 Declaration states
10 that she is a registered translator and interpreter for the Slovenian language to and from
11 English. I, with the assistance of others who are native Slovenians, Croatians and
12 Bosnians, translated the Summons into Slovenian.

13 58. Service on inactive entity defendant ISM Vuzem USA, Inc. was completed pursuant
14 to Order of February 5, 2019 which allowed Plaintiffs and Relators to serve ISM Vuzem
15 USA Inc. by service by registered or certified mail, return receipt requested (ECF # 347).
16 Service was made on February 7, 2019 of the November 1, 2018 filed Third Amended
17 Complaint (ECF # 269), the November 2, 2018 filed In Re Third Amended Complaint
18 Summons (ECF # 271), and the December 21, 2018 filed Order Granting Administrative
19 Motion to Amend Third Amended Complaint [re heading]. The proof of service for this
20 was filed March 14, 2019 as ECF # 360.

21
22 59. Service on inactive entity defendant Vuzem USA, Inc. was completed pursuant to
23 Order of February 5, 2019 which allowed Plaintiffs and Relators to serve Vuzem USA, Inc.
24 by service on the California Secretary of State (ECF # 348). Service was made on
25 February 26, 2019 of the November 1, 2018 filed Third Amended Complaint (ECF # 269),
26 the November 2, 2018 filed In Re Third Amended Complaint Summons (ECF # 271), and
27
28

1 the December 21, 2018 filed Order Granting Administrative Motion to Amend Third
2 Amended Complaint [re heading]. The proof of service for this was filed March 14, 2019
3 as ECF # 359.

4 60. All Slovenian defendants against whom default judgments are sought were served
5 by persons who are process servers in Slovenia and in the county of residence of these
6 defendants, with service being by post with receipt of the Summons, Third Amended
7 Complaint, and Order re Heading in Slovenia.

8
9 61. A very substantial amount of time was spent in service related matters. The time
10 spent by me included locating parties, locating addresses, researching permissible forms
11 of service, and locating people to serve in multiple ways on the multiple Vuzem entities,
12 including two dissolved shell United States entities, an initial employing entity and a
13 successor entity in Slovenia, and two Slovenian individuals. The time spent by me
14 included locating and serving the Eisenmann entities and Tesla. The time included some
15 machine translations, some initial translations, and certified translations for service. I
16 spent 80 hours in time spent on service for the Second Amended Complaint, and an
17 additional 15 hours in these matters for the Third Amended Complaint. I also spent and
18 additional 7 hours for preparing, receiving permission to file, and filing requests for entry
19 of default. I thus identified 102 hours for my time for an added category of Service on the
20 Chart for Fees
21

22 62. My office staff, particularly Deborah Lumley, spent 140 hours on these activities for
23 the Vuzem persons, Eisenmann entities, and Tesla, and in researching information on the
24 Eisenmann and Vuzem entities for service, identified under Services. Much of this
25 information was also used in other categories of services, but the time in other categories
26 is not duplicative of the time allocated to this major litigation task
27
28

CLIENT COMMUNICATIONS

63. I, and my office staff, spent substantial time in continuing and ongoing investigation, and locating and obtaining documents and information from clients, the client's co-workers, and sources both national and from Croatia, Slovenia, Bosnia, and Germany.

64. I have had numerous communications with my client and with co-workers. This was primarily by phone using someone to assist in translations, and by e-mails. The e-mails and attachments often required translations, done in part by me and in part by paralegals with this office, and in part by third persons whose time is for the most part not included in the History Report. A planned in person set of meetings was cancelled due to injury, and then COVID. This is the time spend listed under Client Communications, and the time spent listed under Co-worker Communications.

MOTION PRACTICE AND DISCOVERY

65. I have gathered information to buttress the claims of Mr. Papes in obtaining information for additional claims. For example, I obtained a declaration from Goren "Gogo" Rebic which confirms his working in the United States in 2019 for HRID-Mont, d.o.o. I also obtained proof of transfer of employees and accounts to HRID_Mont, d.o.o. These are relevant to support specific personal jurisdiction over that entity.

66. I gathered information on the irregular contract agreements between large hirers Tesla and others with Eisenmann Corporation, and of Eisenmann Corporation with subcontractors including the Vuzem entities without any construction subcontractor being required to or having workers compensation insurance. This is relevant to liability for coerced labor claimS.

67. There were multiple motions in this case. The included motions to dismiss, joint

1 motions to dismiss, motions to quash, administrative motions to file under seal, to amend,
2 and to extend the time to serve. The time spent included substantial research and
3 additional investigation. This is what is identified for the time amounts stated under
4 Motion Practice for me and for paralegal time.

5 68. Information from many sources gathered over an extended period of time of
6 constant investigation was used for extensive substantive Rule 26 disclosures and 11,845
7 pages of organized bated stamped documents for a Rule 26 production. Additional time
8 was spent in propounding discovery and responding to discovery. This is the basis for the
9 90 hours for my time and the 100 hours for paralegal time identified under Discovery.
10

11 69. I served and re-served Rule 26 Disclosures and Supplemental Disclosures

12 70. I served and re-served discovery requests to Defendants Eisenmann Corporation
13 and Tesla Corporation, obtaining including after filing motions documents that corroborate
14 and support the hours worked by Papes and when.
15

16 SETTLEMENT EFFORTS

17 71. Settlement efforts included written communications to the Vuzems, e-mails and
18 conference calls with counsel for the Vuzem entities, mediation with the Honorable Judge
19 A. Howard Matz, ret. through FedArb, and a settlement conference with the Honorable
20 Magistrate Virginia K DeMarchi. Each had substantial complications, including Mr. Papes
21 being unable to fly on a revoked visa, revoked pursuant to retaliation by the Vuzems.
22

23 72. I proceeded through mediation and settlement conferences with defendants
24 Eisenmman and Tesla, reaching a settlement with those parties on behalf of Stjepan
25 Papes, and on behalf of Gregor Lesnik
26

27 MOTIONS FOR DEFAULT JUDGMENTS

28 73. I have filed multiple motions to obtain a default judgment against the Vuzem

1 persons on FLSA claims for Mr. Papes.

2 74. I filed multiple motions to obtain a default judgment against the Vuzem persons on
3 a coerced labor TVPRA claim for Mr. Papes.

4 75. Additional motions in this case have been motions for default judgments. A very
5 substantial amount of time was spent on locating additional documents and information
6 and on research to support the claims for which judgment has been sought and in
7 complying with Ninth Circuit standards for default judgments including as identified in
8 Orders issued in this case. Of the more than 200 hours spent by me on those motions, all
9 the declarations and supporting evidence support the coerced labor claims and most
10 support the FLSA claims. Most of the facts that support the FCA claim also support the
11 coerced labor claim and much of the facts that support a California wages claim also
12 support the FLSA claim. However, about 40 hours were spent on the motions for
13 judgment on FCA claim and the California wages claims that were not related to the
14 coerced labor or FLSA claims. Thus the time amounts stated for under the added
15 category of Motions Practice – Judgments for me and for paralegal tim
16
17

18 MISCELLANEOUS

19 76. There have been many other matters for which I and my staff spent time. This
20 includes case management, communications with other counsel, and miscellaneous
21 research and investigation. For my office staff, this also included substantial time spent
22 for file organization and maintenance of spreadsheets for case information. This time is
23 listed under Miscellaneous.
24

25 MOTION FOR FEES

26 77. I am filing this declaration in support of recovery of fees. Time for completing and
27 preparing to file the fee motion is separated identified by a report for time on and after
28

1 August 24, 2022.

2 78. Most of the time by Debra Lumley was to locate, save, and organize costs for this
3 file which has five plus years of active litigation, and to prepare the information to
4 complete a Bill of Costs with organized supporting documentation.

5 79. At least 18 hours of my time and 30 hours of paralegal time was spent on preparing
6 the motion for fee and recovery of the Bill of Cost
7

8 **BILLING RATES**

9 80. My customary hourly charges for hourly fee clients in 2016 was \$350 per hour,
10 since 2017 was at the rate of \$375 per hour, and since 2018 has been at a rate of \$400
11 per hour.

12 81. I am a 1982 graduate of the University of California, Hastings College of the Law. I
13 was the only person in my law school class to make law journal on the basis of grades
14 while working during my first year of law school. I was the first person in my law school
15 class to publish a law journal article, also while working during my second year.

16 82. I worked for Matthew Bender on its Criminal Practice publications and for the
17 criminal defense firm of Breakstone and Cotterillo immediately following my graduating
18 from law school. I have thereafter practiced civil litigation and primarily civil litigation since
19 I passed the bar in 1982.
20

21 83. I worked for six years for CalFarm Insurance Company as staff counsel, and then
22 for six years with the firm of Tarkington, O'Connor and O'Neill leaving as a partner. I have
23 thereafter worked for the last twenty-eight years as a sole proprietor, though I have had
24 from one to three attorneys working for me during more than half of these last 28 years.

25 84. I handle every aspect of cases, from retention through litigation, negotiation,
26 mediation, trial and appeal. I am also responsible for all law firm business matters,
27
28

1 including generation of new cases and hiring and supervising support staff and
2 paralegals. All but one of more than twenty law clerks who have worked for me passed
3 the California State Bar examination. This includes clerks who have subsequently
4 become judges.

5 85. I have tried to verdict or decision more than fifty civil cases. I have also tried to
6 decision more than twenty long cause matters and binding arbitrations. My clients were
7 the prevailing parties in my first arbitration, first court trial, and my first jury trial, as well as
8 the vast majority of subsequent binding arbitrations, court trials, and jury trials. I have
9 tried cases to verdict or court judgment in Alameda, Monterey, Sacramento, Santa Clara,
10 Santa Cruz, San Joaquin, San Mateo and Stanislaus Counties Superior Courts, and in the
11 Northern District of California. These include employee claims for, among other things,
12 termination of employment and wages claims. I have commenced trial in every county in
13 Northern California and have litigated cases from Humboldt to San Diego. I have tried
14 long cause matters to decisions in Santa Clara and Sacramento County Superior Courts.
15 I have tried arbitrations through to awards with AAA. This includes for wage disputes. I
16 have tried adversarial proceedings to judgment in the United States Bankruptcy Court for
17 the Northern District of California. I have also litigated hundreds of other cases in state
18 courts, in bankruptcy courts in California, Washington and Georgia, and in the Northern
19 District, Eastern District and Central District of California and the Ninth Circuit Court of
20 Appeals. I have prosecuted and defended wage claims before the California Labor
21 Commissioner. I have been the sole or lead trial counsel for my clients in all of these
22 matters.
23
24
25

26 86. I served as Judge Pro Tem in San Francisco Municipal and Superior Court and in
27 Santa Clara County Superior Court.
28

1 87. I served as chair of the Santa Clara County Bar Association Conference of
2 Delegates for two years, Chair of the Labor and Employment Law Executive Committee of
3 the Santa Clara County Bar Association, and have been a member of a host of local bar
4 association committees.

5 88. I have attended more continuing education classes than could be listed, including
6 from before MCLE was a requirement. This includes MCLE during the pendency of this
7 litigation of federal civil symposiums on class actions and wages claims held in the
8 courthouse at 450 Golden Gate Avenue, San Francisco, CA 94102.
9

10 89. I have been counsel for several appellate decisions, including one with the Ninth
11 Circuit concerning privacy in cordless phone calls prior to amendments to the state and
12 federal privacy acts and one published decision of the Third Appellate District of the State
13 of California concerning a spouse's right to sue for civil damages while pursuing other
14 remedies in a dissolution proceeding.
15

16 90. I provided legal services to well more than 100 insurance carriers, to well more
17 than 100 businesses, and to well more than 400 individuals in my thirty-eight years of
18 active practice as an attorney.

19 91. I am a member of the California State Bar Labor and Employment Law Section.

20 92. I had in the year prior to filing in July of 2017 the Second Amended Complaint in
21 this case, and have since then, actively pursued and represented Stjepan Papes.
22

23 93. The USAO Matrix, formerly known as the Laffey Matrix which derives its name from
24 a seminal case - Laffey v. Northwest Airlines, Inc. (572 F. Supp. 354 (D.D.C. 1983), aff'd
25 in part, rev'd in part on other grounds, 746 F.2d 4 (D.C. Cir. 1984), cert. denied, 472 U.S.
26 1021 (1985)) - is a free resource published each year by the U.S. Attorney's office for the
27 District of Columbia. It offers tiered rates for lawyers, differentiated according to their
28

1 years of experience. The matrix is available at
2 (www.justice.gov/usao/dc/divisions/civil.html).

3 94. The USAO Matrix for 2015 - 2017 for the District of Columbia area states that the
4 hourly rate for attorneys with more than 30 years of experience - which is where I fall -
5 was \$568 per hour for 2015 - 2016 and \$581 per hour for 2016 - 2017. San Francisco
6 has an 8% higher average rate for lawyers compared to that for the District of Columbia.
7 (See *Garnes v. Barnhardt* (2006 WL 249522 at *7 (N.D. Cal.)); see also *Chanel, Inc. v.*
8 *Doan*, 2007 WL 781976 (N.D. Cal.); and *Syers Properties III, Inc. v. Rankin*, 226 Cal.
9 App. 4th 691, 702 (2014).)

10
11 95. The Real Rate Report, published by Wolters Kluwer, is another rate report which
12 has been favorably accepted by many courts. (See *Hicks v. Toys 'R Us-Delaware, Inc.*,
13 2014 WL 4670896 at *1 (C.D. Cal.).) The Real Rate Report states higher hourly rates
14 than the USAO Matrix.

15
16 96. My billing rate charged on this file, and requested in this fee motion, is less than 2/3
17 of the rate set forth in these reports. It is half the rate set favorably viewed and accepted
18 by the Court in *Charlebois v Angels Baseball LP*, 993 F.Supp.2d 1109 (2012), and in the
19 cases cited by the Charlebois court

20 97. The billing rate for paralegal and law clerk services has remained constant for ten
21 years at \$75 per hour.

22 98. The billing rate for other non-administrative services other than for attorney,
23 paralegal or law clerk services is charged by this office at \$45 per hour.

24
25 99. Debra Lumley is a paralegal who was worked for this office at three different times,
26 initially starting in 1996 as a secretary legal assistant, then again in September 2008 as
27 office manager and paralegal, and most recently starting in November of 2017 as a
28

1 paralegal.

2 100. Stacie DelGiudice is a certified paralegal who graduated from West Valley
3 Community College with an Associate Degree in Paralegal Studies. She was on the
4 Dean's list and Honors Program. West Valley Community College's paralegal program is
5 certified by the ABA. She had worked for this office on an ad hoc basis since 2015 and
6 on a full time basis from March until December of 2021.

7 101. Andrea Anderson is a paralegal who I first worked with at Tarkington, O'Commor
8 and O'Neill between 1990 and 1994, and again since January of 2022.

9 102. Laura Diaz was a law clerk with this office between September of 2015 and July of
10 2017 who graduate from University of California College of the Law, San Francisco,
11 formerly known as Hastings College of the Law in May 2020.

12 103. The customary billing rate for their services is \$75 per hour for paralegal and law
13 clerk activities. This is identified in this office's Timeslips billing program as a level 2 rate.

14 104. For these reasons and based on the experience stated herein, I request that the
15 Court find that the value of services is at least at the rates set forth in the attached
16 Exhibits 751 and 752.

17 **COSTS**

18 105. I am filing concurrently with this declaration and the accompanying motions a Bill of
19 Costs. This Bill of Costs only seeks recovery of recoverable costs under the coerced
20 labor claims and FLSA claims on behalf of Stjepan Papes.

21 106. The total amount of costs stated in the Bill of Costs is of fifty-eight thousand two
22 hundred sixty nine dollars and ninety-seven cents (\$58,269.97).

23 107. The total amount of costs listed in the History Report is \$184,353.93. That is for all
24 costs for all matters in this case. Of this, about one-third is sought as recoverable
25

1 expenses under the Bill of Costs for the claims under the Second, Third and Ninth Causes
2 of Action.

3 108. I am not seeking in this motion \$130,000.00 in costs incurred in connection with
4 this litigation which are not related to the coerced labor TVPRA claims and the FLSA
5 wages claims for Mr. Papes.

6 109. All expenses are identified at actual costs.

7
8 110. The expenses have been incurred to assist this office to obtain for the benefit of the
9 Mr. Papes requested by this motion and by the claims and rights stated in the Second,
10 Third and Ninth Causes of Action of the Third Amended Complaint.

11 **SUMMARY AND CONCLUSION**

12 111. I used my judgment to ensure that any redundant, excessive or duplicative efforts
13 were excluded from the total hours for which recovery is sought.

14 112. I am requesting a fee award based on 838 hours of a total of almost 2,000 hours of
15 time spent by me in this case at a rate of \$400 per hour, or \$335,000.00, and on 593
16 hours of a total of more than 1,300 hours of time spent by paralegals and law clerks in this
17 case at a rate of \$75 per hour, or \$44,475.00.

18
19 113. I have not received any advance from any of my clients in this action for fees or
20 costs.

21 114. I have litigated for five years the coerced labor TVPRA and the FLSA wages claims
22 upon which the request for attorneys fees is based.

23 115. Nevertheless, no multiplier is requested despite the complexity and duration of this
24 litigation as to the coerced labor and FLSA claims.

25
26 116. I thus request an award of attorneys fees of three hundred seventy nine thousand
27 four hundred seventy five dollars (\$379,475.00), based on:
28

1 the reasonableness of the value of the services rendered;
2 the amount of time as a Lodestar as being stated in the History Report for Court;
3 the allocation of time reasonable and necessary to obtain recoveries for Mr. Papes;
4 and
5 the appropriateness of and amount of a multiplier based on the time, expense,
6 effort, and duration of the services rendered.

7
8 117. For these reasons, and for the content stated in the History Reports, I request that
9 the Court find that the amount of time stated in the Reports is a proper basis for
10 evaluating this request for Fees as stating the number of hours reasonably expended on
11 the litigation multiplied by a reasonable hourly rate.

12 118. Attached as Exhibits 751 to 754 are:

13 751. History Report for entries through August 23, 2022 redacted as noted
14 above;

15 752. History Report for entries after August 23, as discussed in this Declaration;

16 753. Chart of fees by category of primary tasks based on both the coerced labor
17 TVPRA claim and the FLSA claims for Stjepan Papes as an individual; and

18 753. Chart of fees for FLSA claims alone.
19

20 119. I request on behalf of Stjepan Papes, Plaintiff herein, and for myself as the Law
21 Offices of William C. Dresser, an Order that the Judgment herein include a recovery of
22 fees of three hundred seventy nine thousand four hundred seventy five dollars
23 (\$379,475.00) and costs of fifty-eight thousand two hundred sixty nine dollars and ninety
24 seven cents (\$58,269.97) as set forth in this declaration.
25

26 I declare under penalty of perjury of the laws of the United States that the foregoing
27 is true and correct, and that this declaration was executed by me on October 3, 2022 at
28

1 Los Gatos, California.

2
3 /s/
William C. Dresser

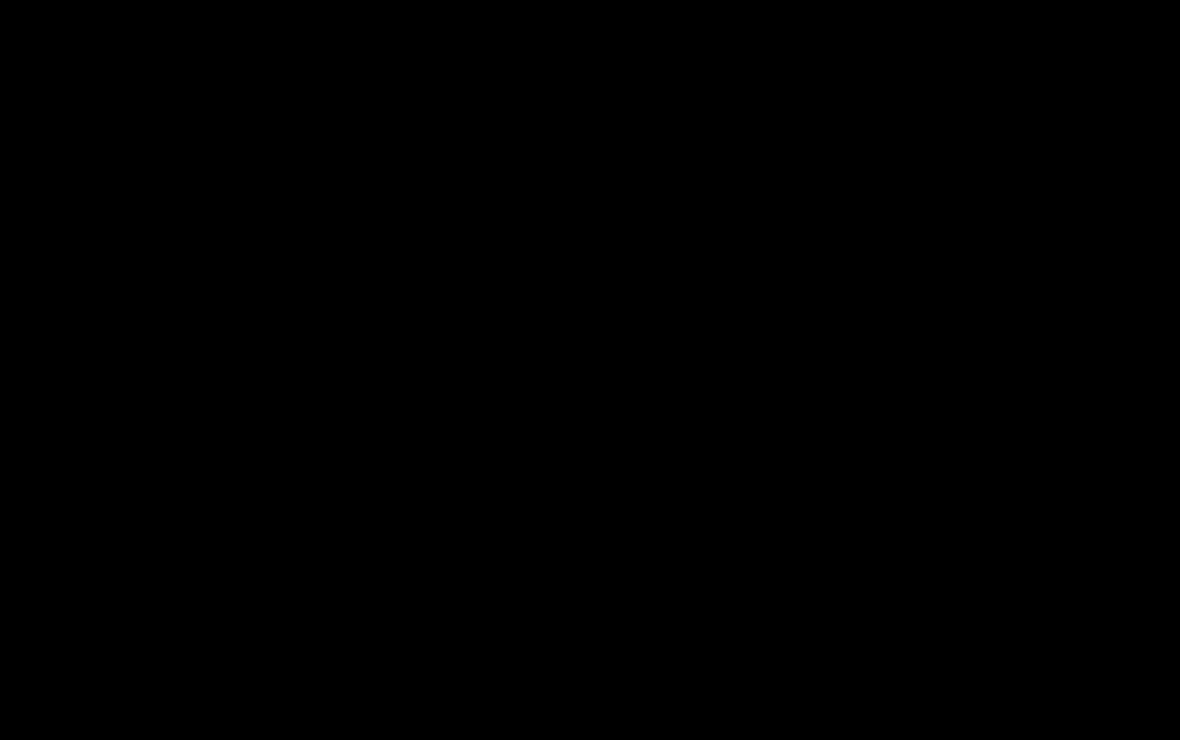
4/

US ex rel Lesnik v Eisenmann, et al; US Dist Ct., ND Cal. 5:16-cv-1120 BLF

EXHIBIT 751

In Reference To: US ex rel Lesnik and Papes v Eisenmann, et al

Rate	Amount
10%	100
20%	200
30%	300
40%	400
50%	500
60%	600
70%	700
80%	800
90%	900
100%	1000



Gregor Lesnik

Page 2

	<u>Rate</u>	<u>Amount</u>
9/25/2015 save Eisenmann representations to US Embassy, save documents re witnesses Csaba and Papas; prepare index of ISM Vuzem documents .2	350.00/hr	70.00
10/3/2015 research other Tesla plant operations, other foreign nationals in other locations, other Tesla management locations, job postings, unions, and other Tesla lawsuits; memos to file .3	350.00/hr	105.00
10/4/2015 organize documents, save in combined format, add searchable functions and numbering of documents 1.5	350.00/hr	525.00
10/19/2015 call with Gregor .5	350.00/hr	175.00
12/3/2015 begin to organize documents to be provided to State Department 1.0	350.00/hr	350.00
12/7/2015 organize further documents for USAG .1	350.00/hr	35.00
12/9/2015 save searchable copies of contracts for USAG .2	350.00/hr	70.00
12/13/2015 organize additional documents for disclosure to government .5	350.00/hr	175.00
12/18/2015 organize and save documents for government including Eisenmann corporate status documents .4	350.00/hr	140.00
12/24/2015 research DOJ press releases on immigration qui tam case, save, evaluate 1.0	350.00/hr	350.00
12/28/2015 research qui tam fraud bases, locate similar fact pattern cases, locate key witnesses, summarize primary qui tam liability, investigate other qui tam Relators in similar fact pattern cases; locate and save Infosys settlement 2.0	350.00/hr	700.00
3/30/2016 Receive and review United States District Court, Summons in a Civil Action; Original Filed Consent or Declination to Magistrate Judge Jurisdiction	350.00/hr	35.00
prepare Summons, to Eisenmann SE, Eisenmann GmbH, Eisenmann Verwaltung, Eisenmann Corporation, ISM Vuzem d.o.o., ISM Vuzem USA, Inc., Vuzem USA, Inc., Robert Vuzem and Ivan Vuzem; review court notice, research local rules, and prepare Declination of Magistrate 1.2 File and have issued pleadings .5 Scan all filed pleadings, name, save	350.00/hr	805.00

Gregor Lesnik

Page 3

	<u>Rate</u>	<u>Amount</u>
.3 Begin draft letter to USAG .3		
3/31/2016 scan, identify, organize and add digital copies of documents to folder for production to USAG, prepare draft letter to USAG, add copies of pleadings to disc, scan Order to file under seal, summons, add documents to folder for production, review rules of court, review rules of procedure, add to letter to USAG; call to USAG, revise addressee; prepare draft certificate of service; add to letter to USAG, revise addressees and draft certificate of service, organize exhibits 5.0	350.00/hr	1,750.00
4/1/2016 Receive and review Ntc of Impending Reassignment to a United States District Court Judge;	350.00/hr	35.00
call with USAG, memo to file; prepare certificate of service, scan certified mail receipts, save USPS receipts 1.0 Save memo of call with McLean, e-mail to McLean .2 Save letter to USAG in digital form .2	350.00/hr	490.00
4/5/2016 call with USAG .1	350.00/hr	35.00
4/7/2016 Receive and review Signed return receipt from AUSA Sara Winslow;	350.00/hr	35.00
4/11/2016 scan and save Order sealing file .1	350.00/hr	35.00
4/13/2016 e-mail from and to Palmer .1 locate and save identification of cash payments .1	350.00/hr	70.00
4/14/2016 Receive and review Filed stamped copy of Certificate of service; Clerks Ntc following case re-assignment to the Honorable Lucy H. Koh;	350.00/hr	35.00
4/15/2016 call with attorney Proctor, letter to Proctor .6 Call with Palmer; e-mails with Palmer .2	350.00/hr	280.00
4/18/2016 e-mails with Palmer .1	350.00/hr	35.00

Gregor Lesnik

Page 4

	<u>Rate</u>	<u>Amount</u>
4/19/2016 call with Agent Dan Robrahn .3	350.00/hr	105.00
save certificate of service, notice of re-assignment .1	350.00/hr	35.00
4/21/2016 US ex rel Lesnik save memos of calls from McLean, Pollard, Dubsick; call to Dubsick .2 E-mails with Palmer .2	350.00/hr	140.00
4/29/2016 call with Melanie Proctor .2 E-mail from Palmer .1 E-mail to agent Robrahn information about case status and witnesses .2	350.00/hr	175.00
5/1/2016 save e-mails with Palmer .1	350.00/hr	35.00
5/2/2016 Call with attorney Proctor .4 e-mail from agent Robrahn .1	350.00/hr	175.00
5/3/2016 memo re call with Proctor, research common interest, memo to file, e-mail to Proctor .3 Save e-mails of past week .2 E-mail from Jay Palmer, call to Palmer .1 call with Palmer .2	350.00/hr	210.00 70.00
5/11/2016 call with Palmer .1 Call to Proctor .1 Forward to Proctor e-mail stating intent of SJ Mercury News to run story this weekend .1	350.00/hr	105.00
5/12/2016 prepare exhibits for disclosure, prepare separator sheets 1.0 Prepare further letter to IRS whistleblower .3	350.00/hr	490.00

Gregor Lesnik

Page 5

Rate Amount

5/18/2016	e-mail from Papes, save documents, e-mail [REDACTED]	350.00/hr	140.00
-----------	--	-----------	--------

5/19/2016	[REDACTED]	350.00/hr	385.00
-----------	------------	-----------	--------

E-mail with Stejpan Papes
.2



Gregor Lesnik

Page 6

	<u>Rate</u>	<u>Amount</u>
5/24/2016 [REDACTED]		245.00
Save attachments to Papes e-mail	350.00/hr	
2 [REDACTED]		

Gregor Lesnik

Page 7

	<u>Rate</u>	<u>Amount</u>
6/15/2016 e-mail to Asst USAG Proctor, e-mail from Proctor .1	350.00/hr	35.00
6/16/2016 travel to and from meeting with Gregor and attend interview of Gregor with Melanie Proctor of USAG, along with Asst USAG Susan E Badger, Federal Investigator US Dept of Labor Wages and Hour Division Eddie Hart, Jr., US Dept of State Diplomatic Security Service SF Field Office Special Agent Dan Robrahn, Dept of Homeland Security, Office of Inspector General, Investigations Division, SF Resident Office Special Agent John Henderson plus interpreter Verena Gale of Half Moon Bay 9.0	350.00/hr	3,150.00
6/17/2016 organize notes and documents from Gregor .5 Call with attorney Proctor .1	350.00/hr	210.00
6/23/2016 Receive and review letter from Whistleblower Office regarding claim for an award under section 7623;	350.00/hr	35.00
e-mail from and to Jay Palmer .1	350.00/hr	35.00
6/24/2016 e-mail to Proctor re status of dismissal of civil action for damages .1	350.00/hr	35.00
6/27/2016 scan, convert to searchable, convert to text list of Vuzem employees 1.5 E-mail from Special Agent Robrahn re phone recording and tech support .1	350.00/hr	560.00
6/29/2016 call with attorney Proctor re communications with former Vuzem witnesses, contacts for wages claims, filing of First Amended Complaint in qui tam action, analysis that unjust enrichment and quantum meruit are government claims and not a relator claim, discussed Gregor destroying phone, discussed hearsay about customs agents being aware of this case, memo to file .5	350.00/hr	175.00
7/15/2016 Receive and review First Amended Complaint for damages and other relief under the false claims act filed under seal	350.00/hr	35.00
revise and complete First Amended Complaint, file, scan filed copy of FAC, prepare proof of service on Cal AG 1.5	350.00/hr	525.00
7/18/2016 memo re Fremont Fire Dept records .2	350.00/hr	70.00

Gregor Lesnik

Page 8

	<u>Rate</u>	<u>Amount</u>
7/20/2016 Filed certificate of service under seal .5	75.00/hr	37.50
Receive and review Filed copy of Certificate of service of first amended complaint;	350.00/hr	35.00
7/25/2016 receive e-mail from Palmer .1	350.00/hr	35.00
8/5/2016 e-mail ro Gregor .1	350.00/hr	35.00
8/11/2016 e-mails with Jay Palmer .2	350.00/hr	70.00
8/22/2016 e-mail to Danijel and Gregor about status .1	350.00/hr	35.00
8/23/2016 e-mail from Danijel Travancic in response to request for Gregors notes .1	350.00/hr	35.00
8/26/2016 conference with Lou Hansen about status of unrelated matters .1 Danijel Travancic to office with documents .1 Scan and save notes .1 E-mails with Palmer and discuss memorializing prior oral consulting agreement .2	350.00/hr	175.00
8/29/2016 create memo of witness information 2.5	350.00/hr	875.00
9/8/2016 scan and save business cards for US investigators and counsel .1	350.00/hr	35.00
9/23/2016 call Eddie Hart at US Dept of Labor, call to Melanie Proctor .2 Forward e-mail to Hart to joint interest counsel Proctor with explanation .1 Complete and save memo of witnesses as identified by Gregor with input from prior investigations, save; e-mail to Proctor 1.5 E-mails with Jay Palmer .1	350.00/hr	665.00
9/25/2016 call with Jay Palmer .1	350.00/hr	35.00

Gregor Lesnik

Page 9

	<u>Rate</u>	<u>Amount</u>
9/29/2016 e-mail to Simunic .1	350.00/hr	35.00
10/11/2016 prepared cover letter and mailed out payment .2	75.00/hr	15.00
e-mail from Jay Palmer, sign, save, letter to Palmer .1	350.00/hr	35.00
10/17/2016 e-mail with Jay Palmer .1	350.00/hr	35.00
10/18/2016 research other worker visa problems .1	350.00/hr	35.00
10/20/2016 organized file .3	75.00/hr	22.50
10/31/2016 receive e-mail from Jaka Tansek, view facebook and save posted pictures, e-mail to Tansek; confirm on list of Vuzem employees (with a much older Tansek), e-mail to Gregor, e-mail from Travancic, e-mail from other worker, e-mail to Gregor and to Travancic; further Facebook investigation; memo to file, save posted photos, call to counsel Melanie Proctor, memo to file 2.0	350.00/hr	700.00
11/2/2016 e-mail from and to Gregor .1	350.00/hr	35.00
11/6/2016 e-mail to Melanie Proctor .1	350.00/hr	35.00
11/14/2016 e-mail from Asst USAG Proctor, review, execute, scan and return by e-mail to counsel; calendar anticipate new dates .3 E-mail to Danijel .1	350.00/hr	140.00
11/23/2016 e-mail to Melanie Proctor re Vuzem / Eisenmann monetary transaction .1	350.00/hr	35.00
12/1/2016 Receive and review Filed copy of Order for Stipulation and Request for Enlargement of time, Filed under seal;	350.00/hr	35.00
1/25/2017 Receive and review Reassignment Order changing referral magistrate judge from Judge Cousins to Judge Susan van Keulen	350.00/hr	35.00
1/27/2017 scan Notice of Reassignment, print, letter to government's counsel .1	350.00/hr	35.00

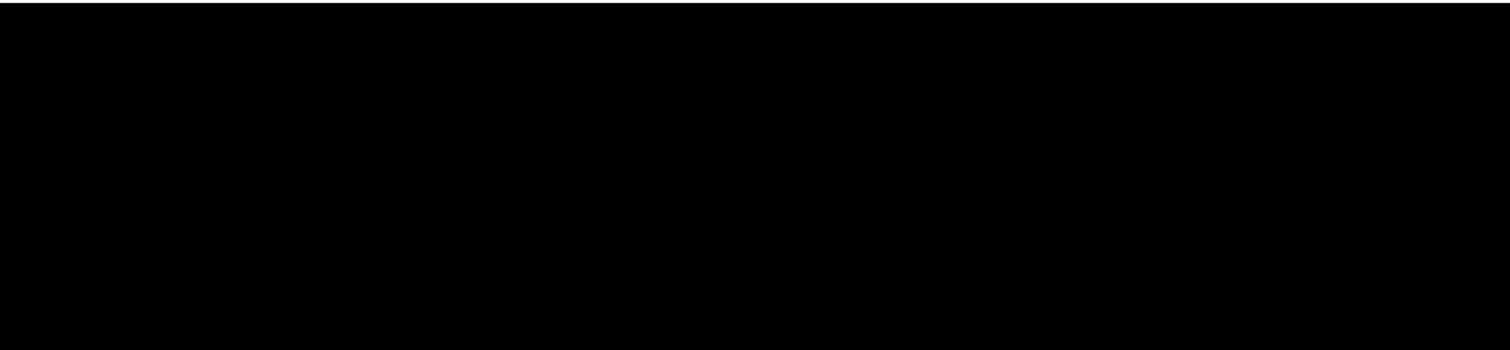
Gregor Lesnik

Page 10


Date Amount


3/6/2017 e-mail from Papes
.1

350.00/hr 35.00


3/24/2017 e-mail from and to Papes,
.1

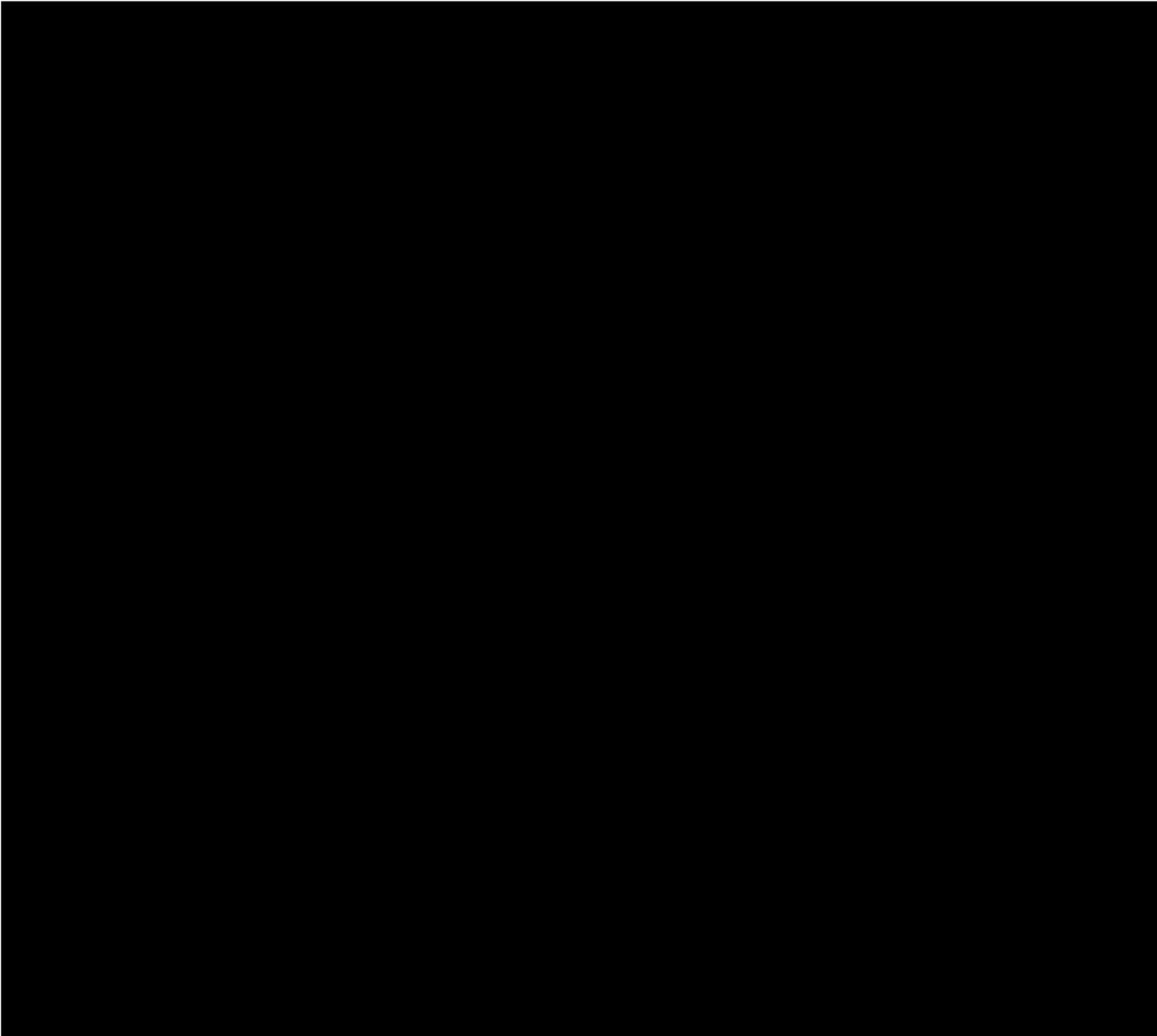
350.00/hr 35.00


E-mail to Papes, e-mail to Gregor and Danijel re status
.2

Gregor Lesnik

Page 11

	<u>Rate</u>	<u>Amount</u>
4/15/2017 e-mail saved in text with Papes .1	350.00/hr	35.00
4/16/2017 e-mails from Stjepan Papes providing places worked and dates, review, save, confirm receipt .2	350.00/hr	70.00



Gregor Lesnik

Page 12

	<u>Rate</u>	<u>Amount</u>
5/6/2017 e-mail to Fuller re documents on USB, e-mail from Fuller re Palmer .2	350.00/hr	70.00
5/8/2017 e-mail from Palmer about H1B visas .1	350.00/hr	35.00
5/9/2017 Research online records of visa issuance; save online database press release .3	350.00/hr	105.00
e-mail to Jay Palmer re use of USB drive .1	350.00/hr	35.00
5/10/2017 conference with Danijel Travancic to discuss status and communications with Gregor re status 1.0 Call to Kenneth Simonton, Wage and Hour Investigator, inquiring as to status of claim .1 Save letter from USAG .1	350.00/hr	420.00
5/12/2017 conference with potential co-counsel, review state bar rules, prepare addendum to retainer, call with Danijel 1.0 (no charge) e-mail from Gregor, save signed addendum to retainer .1	350.00/hr	385.00
5/13/2017 meeting with Danijel Travancic for source information provided by client 1.0	350.00/hr	350.00
5/15/2017 e-mail from Jay Palmer, call with Jay Palmer, call with Bill Fuller .3 Save e-mail from Gregor and scanned signed retainer .1 Review e-mails with Gregor, Assemble information about people currently working in US, locate supporting documents, e-mails with Palmer about case status .3 Save e-mails and memos of past week .1	350.00/hr	280.00
5/16/2017 e-mail from Palmer, forwarding e-mails with attorney Michael Hancock and with Ronil Hira .1 Call with Michael Hancock; memo to file, e-mail to Hancock .7	350.00/hr	280.00
5/17/2017 Receive and review Letter from Charles Lee	350.00/hr	35.00

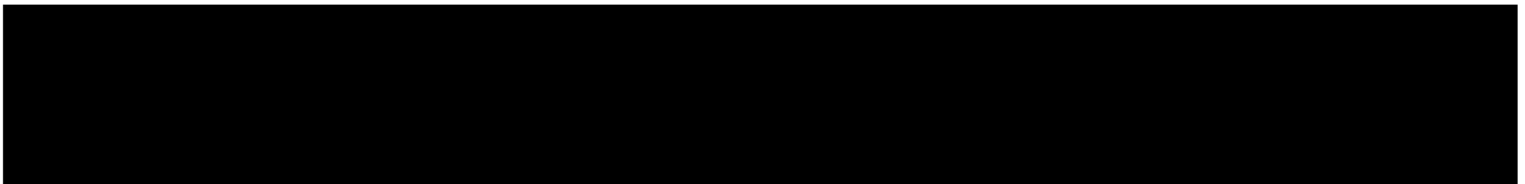
Gregor Lesnik

Page 13

Rate Amount






5/31/2017	locate and save corporate status documents for Tesla, call from Stjepan Papes, call from Danijel, e-mail from Gregor, locate and save Croatian news posts re Tesla	350.00/hr	210.00
	.6		



Gregor Lesnik

Page 14

		<u>Rate</u>	<u>Amount</u>
			
6/8/2017	call with Gregor, with Danijel and with Stjepan, e-mail to Palmer to provide addresses to Emily of CBS .5	350.00/hr	175.00
6/10/2017	calls with Stjepan, memo to file; research public disclosure bar 1.0 organize documents and e-mails to attorney Michael Hancock re scheduling phone call .1	350.00/hr	385.00
6/11/2017	calls with Hancock .2 E-mails with Papes, review e-mail to Simonton re wages claims; e-mail to Eastwood and Hart about status of federal investigation of wages claims; e-mail from Hart; call with Papes; e-mail to Stjepan .4	350.00/hr	210.00
	conduct internet search for documents to support client claims including of Eisenmann employees and agents and Eisenmann contracts for sites identified by clients 2.5	350.00/hr	875.00
6/12/2017	e-mail from Hancock, e-mail from Eastwood re assignment of file .1 Call with Michael Hancock re evaluated claims for wages, memo to file .5 Research internet press releases, ave same .1	350.00/hr	245.00
6/13/2017	 call with Stjepan Papes re  and wages issues and supporting evidence 2.0	350.00/hr	840.00
6/14/2017	call from Stjepan Papes, attempted call with Stjepan Novoselac about interview by CBS .4 E-mail from Gregor .1 Research employers and work locations identified by Stjepan and Gregor, memos to file, save internet documents supporting claims; save and review letter from USAG; memo of additional inserts to intended Second Amended Complaint, further calls with Stjepan, save details of work loads for visas	350.00/hr	1,330.00

Gregor Lesnik

Page 15

		<u>Rate</u>	<u>Amount</u>
	3.0 E-mail to Emily Rand		
	.1 e-mail to Simunic		
	.1 E-mail to Stjepan and Gregor re status		
	.1		
6/15/2017	additional research re locations and employers identified by clients, internet search, memos to file; memo of additional inserts to Second Amended Complaint	350.00/hr	1,260.00
	2.5 begin to create folder for further disclosure to USAG		
	.3 Call with Palmer		
	.1 Receive, save, review and index bank records, wages representations, pay records, and contract		
	.4 Further e-mails from Papes of work sites and employers, save		
	.2 E-mails to Hancock		
	.1		
6/16/2017	save e-mails of past week		105.00
	.1 E-mail to Papes re witnesses including Novoselac	350.00/hr	
	.1 E-mail from and to Hancock re summary of claims		
	.1		
6/17/2017	prepare proposed Class Action retainer based on discussions with clients and contemplated associated counsel	350.00/hr	70.00
	.5 (no charge) e-mails with Stjepan and Gregor		
	.2		
6/18/2017	e-mails from Stjepan Papes, save and print e-mails and attachments, followup e-mail to Stejpen, text and e-mail from Stjepan; forward to e-mail one page of text photos; conduct Facebook investigation; further followup e-mail to Papes	350.00/hr	770.00
	2.0 Evaluate process to prepare an amended complaint		
	.2		
	receive and save signed retainer, execute retainer, e-mails to clients		1,050.00
	.2 receive and save documents from Papes, review as converted to English the text of Vuzem proposed release of claims with no payment, save client information re other involved entities, internet research re entities and workers	350.00/hr	
	2.5		

Gregor Lesnik

Page 16

		<u>Rate</u>	<u>Amount</u>
	Evaluate further activities to support clients described claims .3		
6/20/2017	research and memo re contractor denied recovery in absence of comp insurance .2 E-mail from Hancock re call, detailed call re all issues of qui tam and wages claims, memo to file .4	350.00/hr	210.00
6/21/2017	call with Emily Rand .1 E-mail from Rand .1 E-mail to Hancock of employment contract documents .1	350.00/hr	105.00
6/23/2017	receive, download, review and save Gregor pay records .2	350.00/hr	70.00
6/25/2017	receive identification of employers and locations, evaluate other causes of action for Second Amended Complaint, memo re wages to be paid, begin to prepare draft Second Amended Complaint based on new information from clients; review CACA instructions; review and revise draft SAC 6.0	350.00/hr	2,100.00
6/26/2017	research re RICO causes of action, memo re other causes of action to insert, memo re employers and locations to estimate full time equivalents; update list of involved defendants; conduct internet search for information about employers identified by clients, save internet and social media postings, save Papes pay stubs, save contracts, save Slovenian article re Gregor, save Papes documents re taxes paid in Slovenia, save Papes contract, research related companies; e-mail to Michael Hancock of contract and wages documents 3.0	350.00/hr	1,050.00
	meeting with Emily Rand .5	350.00/hr	175.00
6/27/2017	e-mails with attorney Hancock about documentation to support wages claims .1	350.00/hr	35.00
6/28/2017	conducted research for SAC 2.0	75.00/hr	150.00

Gregor Lesnik

Page 17

	<u>Rate</u>	<u>Amount</u>
6/28/2017 call from Chuck Lee, counsel for VW .3 Conduct internet and social media research re Volvo, LB Metal, .8 Add to draft Second Amended Complaint .5	350.00/hr	560.00
7/2/2017 US ex rel Lesnik evaluate further activities to prepare Second Amended Complaint 1.0	350.00/hr	350.00
7/3/2017 e-mails confirming mediation scheduling .1	350.00/hr	35.00
7/6/2017 e-mail from Palmer .1	350.00/hr	35.00
7/7/2017 conduct research for SAC specific companies researched: LB metal d.o.o., aka Mos LB Metal d.o.o., D2N Tehnologije d.o.o. aka D2N d.o.o., Primiko, d.o.o. , Volvo Car USA , Deere & Company, dba John Deere, Lax Fabricating Ltd, Keystone Automotive Operations Inc., Phoenix Mechanical Contractors , HRD/ MONT d.o.o. (Could not find), VV Mont (could not find), Magma, Intl , Magma, d.o.o., We-Kr d.o.o. , MDM Polska sp. z.o. o., and Moss, d.o.o. 5.0	75.00/hr	375.00
add to draft Second Amended Complaint, re-organize by defendant identification, topics and causes of action 4.5	350.00/hr	1,575.00
7/8/2017 review file for revisions to draft Second Amended Complaint .5	350.00/hr	175.00
7/9/2017 research filing under seal 1.0	350.00/hr	350.00
7/10/2017 begin to prepare ex parte application to file under seal, locate and identify as exhibits letters and notices from USAG, review local rules, begin administrative motion to file under seal 2.0	350.00/hr	700.00
7/11/2017 e-mails with Palmer and Hancock about status .2	350.00/hr	70.00
7/12/2017 internet search and save social media postings of involved defendants Phoenix Mechanical, Keystone Automotive, LAX Fabricating, John Deere, VV Mont, Magma, Wekr, and employees / workers for the same; revise draft SAC 3.5	350.00/hr	1,225.00

Gregor Lesnik

Page 18

	<u>Rate</u>	<u>Amount</u>
7/13/2017 e-mail from and calendar calls with Hancock .1 (no charge)	350.00/hr	NO CHARGE
7/14/2017 e-mail from Hancock re defendants and supervisors, e-mail to Hancock .1 Review and revise draft Second Amended Complaint 5.0 E-mails with Emily Rand .1	350.00/hr	1,820.00
7/15/2017 add to and revise draft Second Amended Complaint 3.5 Call with Emily Rand .1	350.00/hr	1,260.00
7/16/2017 locate internet information re Volvo, Volvo Car Group, NPWHC and prevailing wage determinations, definition of racketeering; e-mails with Danijel, Stjepan and Gregor; review Papes work history and revise activity allegations, review Eisenmann letters for Papes and update Eisenmann allegations; continue to add to and revise draft Second Amended Complaint including grammar, text, and numbering of paragraphs 11.0	350.00/hr	3,850.00
7/17/2017 research re minimum wage laws by state, FLSA cause of action, labor trafficking, civil remedies for trafficking; review and save Eisenmann invitation letter, insert text into SAC, review and save ISM certificate of employment, BMW hours, security cards, visas, Vuzem propose release without payment; review notes and emails with attorney Proctor of USAG; research California Civil Code and Penal Code statutes; research federal trafficking statutes; conduct internet and social media search re US presence of entity defendants and employees including from RIMSA; cross-review Papes work history with allegations of SAC; review prior e-mails from clients; review local rules re filings and administrative motions to file under seal; prepare a penultimate draft of Second Amended Complaint, e-mails with Hancock re qui tam questions, e-mail to clients and associated counsel 8.0	350.00/hr	2,800.00
7/18/2017	350.00/hr	4,900.00
7/19/2017 Receive and review Received Stamped Proposed Order Granting Administrative Motion to File Under Seal, to File Second Amended Complaint, and to Set Date for Service; Received Stamped Administrative Motion to File Under Seal, in conformance with Civil L.R. 7-11, 79-5, and 31 U.S.C. section 3730(b)(2) [including motion to amend and to set due date(s) for service]; Received Stamped Second Amended Complaint for Damages and Other Relief Under the False Claims Act and Other Claims Including Wages and	45.00/hr	4.50

Gregor Lesnik

Page 19

		<u>Rate</u>	<u>Amount</u>
	Visa Based Claims, Collective and Class Action Claims, Labor Trafficking Claims, and RICO Claims		
7/19/2017	conference with Danijel; complete for filing Second Amended Complaint, administrative motion, proposed Order; file paper copies of pleadings, deliver chambers copies to Court Clerks office; receive e-notice of filing proposed Order, and e-notice of filing under seal Second Amended Complaint and Administrative Motion; save record that other pleadings not accessible to public using PACER 5.0 E-mail to Rand, call with Rand re public case status .2	350.00/hr	1,820.00
7/20/2017	e-mails with Emily Rand .1	350.00/hr	35.00
7/23/2017	organize scanned cover pages and compile pdf of filed pleadings and administrative motion to file under seal; e-mail to Hancock; e-mail to clients .5	350.00/hr	175.00
7/24/2017	e-mails to and from Melanie Proctor re service and re no objection to Relator proceeding on qui tam case .1	350.00/hr	35.00
7/26/2017	e-mails with Palmer about case status .1 Organize documents and pleadings .2	350.00/hr	105.00
7/28/2017	sort and save documents by categories, organize for disclosure to government, save memos of call from Novoselac, prepare letter to attorney Proctor 3.0	350.00/hr	1,050.00
7/29/2017	call with Emily Rand, text and e-mail re news broadcast, view CBS On Assignment, memo re broadcast; view web page of broadcast, scroll through posted information frame by frame, save information re CBSN identified involved companies, save screen shots 2.5	350.00/hr	875.00
	save prior filed pleadings not downloaded because under seal, including initial complaint, service of April 2017 declination to intervene, April 2017 Order to unseal; prepare Certificate of Service, scan for filing, e-file .7	350.00/hr	245.00
8/1/2017	e-mails with Jay Palmer; research Cathleen Caron .3	375.00/hr	112.50
8/2/2017	view CBSN website, view video of making broadcast, save screen shots of video, prepare memo of key words from video 2.0	375.00/hr	750.00

Gregor Lesnik

Page 20

	<u>Rate</u>	<u>Amount</u>
8/3/2017 e-mail to consultant Palmer per NDA of filed pleadings .1	375.00/hr	37.50
8/4/2017 call / message to Jay Palmer about case, govt, filing, and AGs office .1 Call from VWs atty Chuck Lee .2 Discuss with staff corroborating information from CBSN broadcast and clients role .2	375.00/hr	187.50
8/5/2017 save notes and memo re CBSN On Assignment broadcast and re video about making the broadcast .3	375.00/hr	112.50
8/6/2017 save company statements in response to CBS New Reporting, particularly Mercedes-Benz .2 Prepare drafts of anticipated requests to produce 3.0 Research FOIA requests, save directions, memo re draft FOIAs 1.0 E-mails and calls with Stjepan Papes .2 Conduct internet search for companies and for related and linked information: Felnar, Dato Avtomatizac, AVK, removed web page of AVK Solutions, and of AVK Automation, Internation Workers Group, registering company in Slovenia, Data d.o.o., JB Tech d.o.o., Delmont d.o.o., Bindi, Mos Services LLC, job fairs, customers, VV Mont, SAR, Bojan Klaric, Cain Group AG, TKMG, Cardinal FG, Cardinal Portage, Telos Global, HD Mont, MDM Polska, 3.0	375.00/hr	2,025.00
8/7/2017 Call with Gary Azorsky of Cohen Milstein .7	375.00/hr	262.50
8/8/2017 receive Order allowing filing under seal, download, save, calendar; e-mails to clients; call with Travancic, e-mail to Hancock, call with Azorsky 1.0	375.00/hr	375.00
8/9/2017 conduct investigation and save information re employers, consultants, facebook and video confirmation of clients claims, and Papes visa, employment and time sheets 1.0	375.00/hr	375.00
8/10/2017 consultation with immigration law attorney Grbeshi, e-mail to Hatixhe Grbeshi .2	375.00/hr	75.00
8/13/2017 call with and e-mails with immigration law attorney Grbeshi .3 Calls and e-mails with labor and Comp law attorney Gutierrez .2	375.00/hr	187.50

Gregor Lesnik

Page 21

	<u>Rate</u>	<u>Amount</u>
8/13/2017 e-mails and call with Stjepan; save Lansing Michigan information 1.0 E-mails with litigator Abbott re service on foreign defendants .1	375.00/hr	412.50
8/14/2017 research service on foreign entities and other defendants, memo to file 1.0 E-mails with Grbeshi .1	375.00/hr	412.50
8/15/2017 Call Haxtihe Grbeshi .1	375.00/hr	37.50
8/30/2017 e-mails with Hancock .1	375.00/hr	37.50
8/31/2017 Call from Bay Area News, memo to file .1 e-mails with Hancock .1	75.00/hr 375.00/hr	7.50 37.50
9/4/2017 e-mail from Michael Hancock to reschedule .1	375.00/hr	37.50
9/5/2017 call Michael Hancock; save scan signed Papes retainer, e-mail to Hancock .2	375.00/hr	75.00
9/18/2017 e-mails with Papes .1	375.00/hr	37.50
9/28/2017 conf with Lou Hansen of Mercury News .2 Obtain file-endorsed SAC as applied for, scan, save, e-mail to clients and proposed associated counsel; print, mail to USAG (previously e-mailed), prepare certificate of service; save URL for which clients are the source information, memo to file; call with Gary Azorsky re qui tam claims; prepare Administrative Motion Re Filing Under Seal the Certificate of Service, prepare proposed Order; organize for filing, e-file; receive e-notice of filing under seal 2.0	375.00/hr	825.00
9/30/2017 receive and save Order granting administrative motion to file under seal .1	375.00/hr	37.50
10/2/2017 e-mails with Michael Hancock re anticipated fees and costs of litigation .1	375.00/hr	37.50
10/3/2017 call with Gary Azorsky, memo to file .7	375.00/hr	262.50

Gregor Lesnik

Page 22

	<u>Rate</u>	<u>Amount</u>
10/3/2017 Memo re USAG qui tam summary .2	375.00/hr	75.00
10/4/2017 Receive and review signed return receipt from Melanie Proctor's office; scan and save return receipt signed by Melanie Proctor .1	375.00/hr 375.00/hr	37.50 37.50
E-mail from Michael Hancock .1	375.00/hr	37.50
E-mail to Papes .1	375.00/hr	37.50
10/5/2017 receive, execute and save co-counsel agreement with Cohen Milstein; letter to Hancock, letter to Cohen Milstein NY office enclosing records .5	375.00/hr	187.50
E-mails with Stjepan Papes, Gregor Lesnik, Michael Hancock .3	375.00/hr	112.50
E-mail from Stjepan .1	375.00/hr	37.50
10/6/2017 Receive and review Notice of the United States that it is not Intervening at this time; [Proposed Order] filed under seal	375.00/hr	37.50
call with Danijel Travancic re status .4	375.00/hr	150.00
10/8/2017 Locate employee names, contact info, and visa information, and add to spreadsheet	75.00/hr	450.00
call with Stjepan Papes .6	375.00/hr	225.00
Research and investigation re Jay Palmer .1	375.00/hr	37.50
Investigate re Durbin at employment litigation conference .1	375.00/hr	37.50
10/9/2017 receive e-mail, save signed agreement from Cohen Milstein, e-mails to and from Michael Hancock .1 (no charge)	375.00/hr	NO CHARGE
review memos of calls with Gary Azorsky .2 (no charge)	375.00/hr	NO CHARGE

Gregor Lesnik

Page 23

	<u>Rate</u>	<u>Amount</u>
10/9/2017 e-mail to Azorsky, from Azorsky, and to Azorsky .1	375.00/hr	37.50
Call to Proctor, e-mail to Proctor, receive reply e-mail that I no longer work for the U.S. Attorney's Office; research e-notices from website, review state bar website for attorney status; E-mail to attorney Jessica Hurtado at USAG about replacement attorney for Melanie Proctor .4	375.00/hr	150.00
E-mails to Stjepan and Gregor about developments, status and representation .3	375.00/hr	112.50
Discuss with staff creating spreadsheet and program to evaluate damages .1 (partially charged)	375.00/hr	37.50
call with Gregor .3	375.00/hr	112.50
10/10/2017 Receive and review Notice of Substitution of Counsel	375.00/hr	37.50
Receive and review Return Receipt from AUSA Sara Walker's office;	375.00/hr	37.50
receive e-notice of substitution of attorneys; review file notes, gather documents received by e-notice and mail, go to ND Clerk's Office, discuss filing status and USAG representation status .8	375.00/hr	300.00
call with Gary Azorsky .2	375.00/hr	75.00
memo of named defendants, begin spreadsheet for service purposes .3	375.00/hr	112.50
Research re false claims act fraud claims, labor certification, visa fraud, and defense analysis of false claims act, memos to file 2.0	375.00/hr	750.00
Calls with counsel re potential association .5 (no charge)	375.00/hr	NO CHARGE
E-mail to Stjepan and Gregor re status and all issues pending .4	375.00/hr	150.00
Locate and save lists of Vuzem workers and hours at Tesla, in Lansing, MI; investigate, discuss with staff, and discuss with IT conversation to excel .3	375.00/hr	112.50

Gregor Lesnik

Page 24

	<u>Rate</u>	<u>Amount</u>
10/10/2017 E-mails from and to Jessica Hurtado re assignment of Kim Friday .1	375.00/hr	37.50
Translate list .1	375.00/hr	37.50
Scan and save mailed copy of Notice of Not Intervening .1	375.00/hr	37.50
10/11/2017 Researched and gathered information for Service of process of Complaint 6.0	75.00/hr	450.00
discuss with staff obtaining addresses and service information for named defendants .2	375.00/hr	75.00
Research qui tam statutes, save texts, analyze same 1.5	375.00/hr	562.50
Scan and review basis for non-intervention, save, e-mail to Azorsky .1	375.00/hr	37.50
E-mails with Emily Rand of CBS .1	375.00/hr	37.50
10/12/2017 Researched and gathered information for Service of process of Complaint	75.00/hr	281.25
discuss with staff gathering defendant address and service information, assist in internet searches for corporate records .4	375.00/hr	150.00
E-mails with Azorsky re scheduling .1 (no charge)	375.00/hr	NO CHARGE
save e-substitution of attorneys, save address for Deputy USAG Kim Friday, call and leave message for Friday, memo to file, e-mail to Friday; e-mail from Friday, schedule phone call .3	375.00/hr	112.50
Locate and save e-mails with Kim Friday .1	375.00/hr	37.50
Call with Emily Rand .2	375.00/hr	75.00
10/13/2017 e-mails with Christine Webber, Michael Hancock and Miriam Nemeth about wages claims and scheduling phone calls, calendar .1	375.00/hr	37.50

Gregor Lesnik

Page 25

	<u>Rate</u>	<u>Amount</u>
10/16/2017 Researched Business in complaint for Service of process of Complaint 4	75.00/hr	300.00
prepare for and teleconference with Christine Webber, Miriam Nemeth, and Gary Azorsky; memo to file; identify key documents referred to, e-mail to co-counsel; e-mail pleadings to co-counsel 1.2	375.00/hr	450.00
Call and leave message for Palmer .1 (no charge)	375.00/hr	NO CHARGE
research re visas and applicable statutes and regs; save statutes and regs and highlight in memos, e-mail to Azorsky 1.5	375.00/hr	562.50
Assist in creating and adding data for service spreadsheet .3	375.00/hr	112.50
10/17/2017 Service of Process of Business Entity	75.00/hr	300.00
Service of Process of Business Entity 4.0	75.00/hr	300.00
research recent FCA decisions including Escobar, and research visa cases including Bricklayers 1.0	375.00/hr	375.00
call Jay Palmer .3	375.00/hr	112.50
Gary Azorsky .4	375.00/hr	150.00
conference call with Kim Friday .5	375.00/hr	187.50
Gary Azorsky .4	375.00/hr	150.00
Further Call with Azorsky .2	375.00/hr	75.00
Discuss with staff further location to search and save information about defendant entity addresses and service locations .2	375.00/hr	75.00

Gregor Lesnik

Page 26

		<u>Rate</u>	<u>Amount</u>
10/17/2017	E-mails with Gregor and Stjepan, and with Stjepan Papes re consulate official issuing visas .2	375.00/hr	75.00
	Investigate consulate offices, E-mail to Palmer about consular officials .2	375.00/hr	75.00
10/18/2017	Service of process research, obtain foreign entity articles, update spreadsheet 7.0	75.00/hr	525.00
	discuss with staff saving articles and corporate records of defendant entities .2	375.00/hr	75.00
	Memo re indicated bases for declining to intervene as compared with known facts, research authorities supporting claims 2.0	375.00/hr	750.00
10/19/2017	Researching Business entities 4.0	75.00/hr	300.00
	discuss with staff corporate information for defendants .2	375.00/hr	75.00
	Conference with Dan Gutierrez, and with Karl Olson 1.0	375.00/hr	375.00
	E-mail from Stjepan that Ljubljana consulate no longer issuing B1 visas .1	375.00/hr	37.50
10/20/2017	research re construction worker visas, memo to file 1.3	375.00/hr	487.50
	E-mail from Papes re Vuzem workers under new named entity .1	375.00/hr	37.50
10/21/2017	Research re indicated bases for declining to intervene as compared with actual claimed monetary damages, memo to file with cited authorities 4.0	375.00/hr	1,500.00
	E-mail with consultant Palmer .1	375.00/hr	37.50
10/22/2017	call with Stjepan Papes 1.2	375.00/hr	450.00
10/23/2017	Worked on International Business Entities 4.0	75.00/hr	300.00

Gregor Lesnik

Page 27

	<u>Rate</u>	<u>Amount</u>
10/23/2017 Receive and review return receipt from USAG US Dept. of Justice.		37.50
	375.00/hr	
review investigation of corporation entities; conduct search for US affiliates of foreign entities		187.50
.5	375.00/hr	
10/24/2017 Worked on International Business Entities		37.50
4.0	75.00/hr	
organize file notes		NO CHARGE
.5 (no charge)	375.00/hr	
research quantum meruit rights under California, Michigan and other state laws, add to memo re wages claims and potential recoveries, save jury instructions and statutes		1,125.00
3.0	375.00/hr	
10/25/2017 Locate employee names, contact info, and visa information, and add to spreadsheet		450.00
	75.00/hr	
discuss sorting out information and documents by employees		75.00
.2	375.00/hr	
Research re discovery of employee contact information, memo to file		375.00
1.0	375.00/hr	
Type up notes of call with Stjepan		NO CHARGE
.3 (no charge)	375.00/hr	
research re FOIA counsel		75.00
.2	375.00/hr	
View videos, review memos from client conversations, prepare and save memo of key word search re other involved parties; memo of electronic documents to request from Eisenmann; memo of identified defendants		750.00
2.0	375.00/hr	
Research immigration attorneys		262.50
.7	375.00/hr	

Gregor Lesnik

Page 28

	<u>Rate</u>	<u>Amount</u>
10/25/2017 Research re trafficking claims 1.5	375.00/hr	562.50
10/26/2017 update and add to research re immigration attorneys .2	375.00/hr	75.00
Update and add to memo of documents and electronic files for Eisenmann to produce .3	375.00/hr	112.50
Further research, re notes of calls with clients, update and add to memo re facts contrary to bases for declining to intervene 1.0	375.00/hr	375.00
Memo re employers and locations .4	375.00/hr	150.00
Revise and save memo re trafficking .3	375.00/hr	112.50
Memo of workers who had been directly employed by Vuzem who are not working in Vance, Alabama .2	375.00/hr	75.00
E-mail to and from Karl Olson .1	375.00/hr	37.50
10/27/2017 organize files and documents .5 (partially charged)	375.00/hr	187.50
10/29/2017 e-mail from Papes, Call with Stjepan Papes; research EU rules on prevailing wages, translate into English regulations 1.0	375.00/hr	375.00
10/30/2017 research re money laundering, memo to file .4	375.00/hr	150.00
prepare FOIA letters to State Department, scan FOIA requests, e-serve FOIA requests 1.0	375.00/hr	375.00
Discuss with staff status of hand entering employee information into spreadsheet .2	375.00/hr	75.00
Save Jay Palmer LinkedIn information .1	375.00/hr	37.50
Research false claims acts and visas, and save computer research results pages and key decisions 2.0	375.00/hr	750.00

Gregor Lesnik

Page 29

	<u>Rate</u>	<u>Amount</u>
10/31/2017 Locate employee names, contact info, and visa information, and add to spreadsheet 6.0	75.00/hr	450.00
memorandum re FOIA counsel, draft memo to counsel .5	375.00/hr	187.50
Save LinkedIn information for workers and supervisors including for other employing entities .2	375.00/hr	75.00
E-mails re scheduling teleconference .1 (no charge)	375.00/hr	NO CHARGE
call with Karl Olson; e-mail to attorney Olson .3	375.00/hr	112.50
Revise draft memo re co-counsel for FOIA requests .4	375.00/hr	150.00
Review additions to hand entered list of workers; locate other information and add to spreadsheet .2	375.00/hr	75.00
E-mail to Gregor and Stjepan re spreadsheet .1	375.00/hr	37.50
11/1/2017 Locate employee names, contact info, and visa information, and add to spreadsheet 5	75.00/hr	37.50
locate and save corporate information for D2N, save digital copies of records .3	375.00/hr	112.50
Locate corporate information for Bayer Motor Werk profile and filing history .2	375.00/hr	75.00
Discuss with staff adding to service spreadsheet .2	375.00/hr	75.00
Call with Jay Palmer and texts .3	375.00/hr	112.50
Locate and extract deposition testimony re Premuzic as supervisor .2	375.00/hr	75.00
Pacer search and save docket .1	375.00/hr	37.50

Gregor Lesnik

Page 30

		<u>Rate</u>	<u>Amount</u>
11/1/2017	E-mail from Papes, save Vuzem demanded Confidential Release of Claims, evaluate same .2	375.00/hr	75.00
	E-mail to clients updated list of other workers .1	375.00/hr	37.50
11/2/2017	Locate employee names, contact info, and visa information, and add to spreadsheet 7	75.00/hr	525.00
	multiple e-mails with Stjepan Papes; locate and save Facebook information for Sasa Varzic of Vuzem, Ivica Vugrinec, Puskaric Tine, Komes Sinisa, Grobeink, Aljosa Brobeinik from 2011 and later, Kristijan Rugani, Kruno Rugani, Mihael Decko, Dalibor Bjegovic, Ratislav Hrehas at Mercedes and Tesla; direct additions to spreadsheet of employee; e-mails with Papes 1.5	375.00/hr	562.50
	Research liability for joint employer 1.0	375.00/hr	375.00
	prepare for and call with Christine Webber, Michael Hancock, and Miriam Nemeth; memo to file 1.0	375.00/hr	375.00
	Forward to Palmer information from Papes about new business by human trafficking convict Premuzik; e-mail from Palmer .1	375.00/hr	37.50
	E-mails with Webber and Palmer .1	375.00/hr	37.50
11/3/2017	save BMW articles and 2017 Statements .2	375.00/hr	75.00
	E-mails (6) from and to (3) Papes re recent Vuzem actions; research plant locations for entities, inquiries about employees and locations of employment .6	375.00/hr	225.00
11/4/2017	Call with Stjepan Papes; multiple e-mails with Stjepan, receive and save Slovenian language release prepared by Vuzem .4	375.00/hr	150.00
	Research prevailing wage determinations for California, save memo to file 1.0	375.00/hr	375.00
	Research public policy on waiver of Labor Code claims, memo to file .6	375.00/hr	225.00
	E-mail to Webber information, research memos .2	375.00/hr	75.00

Gregor Lesnik

Page 31

	<u>Rate</u>	<u>Amount</u>
11/4/2017 Memo to add employees to list .3	375.00/hr	112.50
11/5/2017 Call and e-mail with Danijel Travancic re status of investigation, pleadings, retention of co-counsel and government intervention .6	375.00/hr	225.00
add to draft attachment of defendants, prepare Summons .5	375.00/hr	187.50
E-mail from Papes, research EU equal wages in hiring state, memo to file .3	375.00/hr	112.50
E-mail from Papes, save information about workers for other entities, and other entities not named in Second Amended Complaint .4	375.00/hr	150.00
Short call with Stjepan Novoselac, schedule time to talk .1	375.00/hr	37.50
Call with Stjepan to discuss many topics including representation; E-mail to Webber to schedule interview of Papes .7	375.00/hr	262.50
Locate and save State Department statement re visa applications and Office of Fraud Prevention in response to Congressional inquiry .2	375.00/hr	75.00
Memo to Karl Olson re assistance on Public Records Act requests .4	375.00/hr	150.00
11/6/2017 Locate employee names, contact info, and visa information, and add to spreadsheet	75.00/hr	450.00
attempt call with Stjepan Novoselac using Viber, call with Stjepan Papes .6	375.00/hr	225.00
Research BMW entities company history .2	375.00/hr	75.00
11/7/2017 Research defendants entities 6.0	75.00/hr	487.50
email to Process Service in Germany .1		
Emails and calls with abcLegal re process service .2		
Email to Legal Language re same .2		

Gregor Lesnik

Page 32

	<u>Rate</u>	<u>Amount</u>
11/7/2017 prepare for and call with Stjepan Novoselac; memo to file .4	375.00/hr	150.00
E-mail from Papes, save attachment of employee list, add to list of employees .2	375.00/hr	75.00
Research Wisconsin job sites, Harley Davidson, Geely, Mastermold parts for Harley Davidson .4	375.00/hr	150.00
E-mail to Papes re likely job site in Wisconsin .1	375.00/hr	37.50
E-mails with Webber and Papes .1	375.00/hr	37.50
Direct additions to witness list .1	375.00/hr	37.50
Discuss investigation of fees for service on foreign entities, and time frame for service; discuss memo re service out of country .1	375.00/hr	37.50
Investigation re Keystone Automotive, articles, merger, change of registered address, save articles .5	375.00/hr	187.50
E-mails with Danijel and Stjepan for readable copy of release Vuzem sent to workers and for information about responses by workers .2	375.00/hr	75.00
Save e-mails of past two weeks .1 (partially charged)	375.00/hr	37.50
11/8/2017 Research defendants entities 7	75.00/hr	525.00
discuss with Papes Cohen Milsteins calls with Stjepan; e-mail from Stjepan .2	375.00/hr	712.50
Save records of hours worked for Senad Murathbegovic .2		
Discuss additions to list of employees .1		
Discuss with Webber other class action issues in unrelated proceedings and in this proceeding, memo to file .5 (partially charged)		
research re Tesla recruiters and relationship to Tuscaloosa, Alabama, re Eisenmann AG directors, and related companies .3		
Prepare list for FIOA requests .5		

Gregor Lesnik

Page 33

	<u>Rate</u>	<u>Amount</u>
E-mail to Stanko Tansek .1		
11/9/2017 Research defendants entities 4.0	75.00/hr	315.00
Printout spreadsheet and prepared for FedEx .2		
e-mail from Gregor, save memo re additional information, direct additions to lists .2	375.00/hr	1,012.50
E-mail from GRAF Service re service in Germany .1		
E-mails to and from Stanko Tansek .2		
Update and assist in updating employee and FOIA lists .1		
Update spreadsheet, check spreadsheet for completeness and accuracy, prepare and complete FOIA to State Department for visa information 2.0		
E-mail timesheets to Webber and Nemeth .1		
11/10/2017 research Orders denying motions to dismiss FCA; research pled causes of action, memos to file 1.0	375.00/hr	487.50
Research attorneys who have filed or participated in immigration whistleblower actions .3		
11/12/2017 call with Stjepan Papes; memo to file 1.0	375.00/hr	2,437.50
Save memo of actions taken by government in response to investigation 1.3		
Conduct research regarding and add to memorandum concerning government bases for declining to intervene 4.0		
E-mails with Michael Hancock re co-counseling agreement .1		
E-mails with Kim Friday re discussion and government position .1		
11/13/2017 Calls with the District Court, memo to file	75.00/hr	22.50
messages for Webber, Nemeth, Hancock and Azorsky .3	375.00/hr	1,875.00
E-mails with Papes re action filed in Slovenia re taxes, save attachments .3		
Discuss with staff Summons for multiple defendants, discuss call with court clerk		

Gregor Lesnik

Page 34

	<u>Rate</u>	<u>Amount</u>
.1 (no charge)		
save summary of Papes lawsuit		
.2		
Receive, download, review and save Papes pay records		
.1		
Research and save Rimsa Plus advertisement of employment outside of country		
.2		
Add to 13 page Memorandum concerning government bases for declining to intervene, including legal analysis of governments concerns and facts concerning issues raised		
3.5		
E-mail to Palmer		
.1		
E-mail from Palmer, save memo re Acceptable B-1 Activities, review same, receive Memo re Enforcement Solution, save		
.3		
11/14/2017 Research and prepared Summons on Business Entities		375.00
	75.00/hr	
discuss with staff obtaining defendant corporate and business addresses		2,100.00
.1	375.00/hr	
Call with Webber		
.3		
E-mail to all counsel from Cohen Milstein re case status		
.1		
E-mail to Webber of workers spreadsheet and service spreadsheet		
.1		
Memo re South Carolina information		
.1		
Compare information from memo re Acceptable B-1 Activities, revise and add to Memorandum regarding bases for declining to intervene		
.6		
E-mail to Friday enclosing Memorandum; further e-mails from and to Friday		
.2		
E-mail to Azorsky attaching Memorandum		
.1		
Review Summons, prepare memoranda		
.1		
Save information re BMW, research Keystone Automotive in Pennsylvania corporate records system		
.2		
Review PACER, save docket, review what is and is not under seal; prepare Certificate of Service of Pleadings, convert to pdf, e-file; prepare Administrative Motion to Unseal Complaint, prepare proposed Order; save prior issued Order, upload and e-file		
1.8		
Memo identifying workers denied entry after investigation		
1.0		
E-mail to Kim Friday		
.1		

Gregor Lesnik

Page 35

	<u>Rate</u>	<u>Amount</u>
E-mail to Palmer re policy of State Department to not allow aliens to be construction workers in US		
.4		
Save all e-mails with Palmer		
.1		
E-mail to clients re status		
.3		
11/15/2017 Research business entities		600.00
	75.00/hr	
Receive and review		37.50
Notice of the United States that it; is not intervening at this time; Proposed order	375.00/hr	
Call Stjepan		1,537.50
.5	375.00/hr	
E-mails to and from Papes		
.1		
Call and text Danijel Travancic		
.2		
Discuss updates to service spreadsheet, contacts and whereabouts of foreign entities, returned visa worker spreadsheet, preparation of Summons		
.2		
E-mails from Papes, save attachments, memo of statements by Vuzem in opposition to Papes claim; call with Stjepan		
.7		
E-mail from and to State Department re non-immigrant visa records pursuant to FOIA		
.2		
Save e-notice of filing administrative motion to file under seal		
.1		
E-mail of last night from US attorney Friday attaching Order to unseal and status of e-filing access		
.1		
Memo re Phoenix Mechanical New Mexico entity		
.2 (no charge)		
save internet and state government research re BMW, Dicastal; research service on domestic subsidiaries, save other states corporate information, save LaX, Phoenix Mechanical, Mercedes and Deere & Company information and corporate records		
2.0		
11/16/2017 discuss with staff form of Summons for each defendant to file in pdf		900.00
.1	375.00/hr	
go to courtroom deputy for Judge Koh to determine status of filings and access by WCD as counsel for Lesnik to documents filed under seal		
1.0		
E-mail to Palmer re status, co-counsel, and information		
.2		
Research corporate information re Volvo, save several documents		
.8		

Gregor Lesnik

Page 36

	<u>Rate</u>	<u>Amount</u>
Research corporate information for VW .2 E-mail to Webber et al re status .1		
11/17/2017 call and leave message to Kim Friday re filings and case status .1 Review court order re filing, save to pdf SAC, e-file under seal, save e-notice .2	375.00/hr	112.50
11/18/2017 research re Lee Francis Cissna .2 Research FOIA under federal statute, locate and save DOJ guide for FOIAs, prepare employee list, prepare FOIA to ICE for visa records, save copy of FOIA for ICE records 1.3 Add to draft memo to Karl Olson .5 call with Stjepan Papes; prepare memo of call 1.0	375.00/hr	1,125.00
11/19/2017 Call with Stjepan, memo to file; texts with Emily Rand and with Danijel Travancic 1.0	375.00/hr	375.00
11/20/2017 Research business entities by websites, secretaries of state, and annual reports; add to and revise service spreadsheet, cross-reference to Summons, change Summons to pdf and add attachment of names of defendants 4.0	75.00/hr	300.00
Receive and review Fax from US Department of State, enclosing Cortication of Identity and agreement to pay fees.	375.00/hr	37.50
call with Emily Rand, call with Jay Palmer .2 Review staff notes re service .1 (no charge) prepare initial draft of memo to process servers re service .2 Calls with Kim Friday, memos to file .3 Save and review memoranda on quantum meruit damages .2 Locate, save and review government motion to intervene in unrelated case,	375.00/hr	450.00

Gregor Lesnik

Page 37

	<u>Rate</u>	<u>Amount</u>
analyze same .3		
11/21/2017 Research business entities by websites, secretaries of state, and annual reports; add to and revise service spreadsheet, cross-reference to Summons, change Summons to pdf and add attachment of names of defendants 5.0	75.00/hr	375.00
conference with Lou Hansen .4	375.00/hr	1,012.50
discussion with Bill Abbott .2		
Memo of witness contacted by CBS, memo re address and contact information; call to Donna Rauch, business owner, Automation Engineering Co, Greenville, South Carolina 1.0		
E-mail to Rauch confirming my identity .1		
Discuss with staff service information memoranda .1		
Receive from Papes a 2016 hours log .1		
Call to, e-mail to and from Lief Cabraser .1 (no charge)		
e-mails with Palmer .1		
Watch CBS morning broadcast .1		
research Dodd Frank legislative history in response to BMW stating subcontractor responsibility to ensure workers are legal; save pdf of PLAW .4		
locate and save DS-4230 form Certification of Identity .1		
Locate, read, and save DOJ McNulty Memo re federal prosecution of business organizations; research exculpation authorities cited in memo .2		
11/22/2017 save final version to Friday of analysis of intervention decision .1	375.00/hr	412.50
Prepare memo identifying authorities for qui tam claims 1.0		
11/23/2017 Receive and review Notice from US Dept of State re Papes	375.00/hr	37.50
Notice from US Dept of State re Lesnik		
Receive and review Notice from US Dept of State re Papes	375.00/hr	37.50
Notice from US Dept of State re Lesnik		

Gregor Lesnik

Page 38

	<u>Rate</u>	<u>Amount</u>
11/27/2017 texts with Steve Percelle about file organization .1	375.00/hr	37.50
11/28/2017 receive e-notice of government administration motion to unseal Second Amended Complaint; download and save Notice of No Objection to Unsealing .2 e-mail to attorney Webber et al re status and anticipated further activities .1 Research when complaint about visa is to be investigated under 8 USC 1182(n)(2) .2 E-mails to and from Jay Palmer .1 multiple e-mails to schedule conference call .2 (no charge)	375.00/hr	225.00
11/30/2017 locate information on attorney Aleksic; call to Aleksic with assistance of translator; mem to file; e-mails to Odvetnik Marjan Aleksic re dismissal of Papes lawsuit in Slovenia, e-mail Papes to Aleksic; e-mail from Aleksic; e-mail to Papes .5 Locate information for consular discretion in visa issuing process; save pdf .4	375.00/hr	337.50
12/1/2017 save e-mails with Papes and Odvetnik Aleksic .1 calls with Bill Bernstein of Lieff Cabreser, call with Nisam Desai, call with Emily Wang of CBS News, texts with Jay Palmer, texts with Danijel Travancic; e-mails with Desai including attachments; call with Karl Olson; research USCIS Director Francis Cissnos presentation, save tweets; research Sara Blackwell, e-mail to Blackwell; update service information; research Ivan and Robert Vuzem residences, online maps search; further text to Danijel; memos to file; begin memo re damages cribbing from prior memoranda and adding new research 3.3	375.00/hr	1,275.00
Receive and review letter from UIS Department of State regarding non-immigrant visa records	375.00/hr	37.50
text from Danijel, view google maps, locate and save screen shots of Vuzem residence and of residence to ISM Vuzem business address .3	375.00/hr	112.50
Call with Bernstein of Lief Cabraser .1 (no charge)	375.00/hr	NO CHARGE
call with Karl Olson .1	375.00/hr	37.50
E-mail with Webber .1	375.00/hr	37.50

Gregor Lesnik

Page 39

	<u>Rate</u>	<u>Amount</u>
12/1/2017 Call with Nimish Desai, memo to file, e-mail to Desai, e-mail from Desai, e-mail to Desai .5 (no charge)	375.00/hr	NO CHARGE
save e-filed pleadings by USAG .1	375.00/hr	37.50
Receive information re Cissna talk, call with Emily Rand, memo to file .1	375.00/hr	37.50
E-mail with Sara Blackwell, call with Blackwell .2	375.00/hr	75.00
E-mail to Palmer re status .1	375.00/hr	37.50
12/2/2017 save e-mails of yesterday; e-mail from Sara Blackwell; add to memorandum re damages 1.0	375.00/hr	525.00
E-mail to attorney Aleksic re withdrawal of Papes= Croatian lawsuit .1		
Research importer trade activity reports, begin draft FOIA request .3		
e-mail to Marjun Aleksic .1	375.00/hr	37.50
Evaluate FCA damages calculations, memo to file 1.0	375.00/hr	375.00
Memo re Office of Trade documents .2	375.00/hr	75.00
Save e-mails with attorney Fuller .1	375.00/hr	37.50
12/3/2017 memo to file re service, draft Rule 26 disclosure, damages calculations, FOIA responses, available causes of action under laws of South Carolina, Alabama, Michigan, Minnesota, and Illinois as well as California, associating counsel, .2	375.00/hr	75.00
prepare for call with Cohen Milstein, call, save memo .6	375.00/hr	412.50
Research re Brian Miller atty seeking invite to LinkedIn, re attorney Michael Holton in Alabama .1		
Scan and make searchable FOIA response for Stjepan and for Gregor; extract Certification; e-mail to Stjepan and Gregor .2		

Gregor Lesnik

Page 40

	<u>Rate</u>	<u>Amount</u>
Evaluate further activities .2		
12/4/2017 prepare outline for and teleconference with Christine Webber, Miriam Nemeth, and Gary Azorsky, memo to file 1.0	375.00/hr	375.00
Research and investigation re Vuzem corporate counsel Brian Miller .2	375.00/hr	75.00
Review FOIA response to request for records for Gregor and Stjepan, prepare Certification of Identity for State Department FOIA, e-mails to clients .3	375.00/hr	112.50
12/5/2017 save e-mails with Stjepan and Gregor .1	375.00/hr	75.00
Locate and save Vertex breach of contract complaint based on hiring workers .1		
downloaded, cross referenced and organized invoices for company entities 4.	75.00/hr	30.00
investigation and research re other visa fraud cases, save information .6	375.00/hr	225.00
Discuss with staff status of obtaining information for foreign entities .1	375.00/hr	37.50
12/6/2017 discuss with staff file organization .2	375.00/hr	75.00
12/7/2017 Research and gather information on business entities for Initial Disclosure, Rule 26 5.	75.00/hr	37.50
e-mail from Papes requesting assistance in preparing form, e-mail to clients; e-mail from Stjepan, save Certification of Identity .2	375.00/hr	75.00
12/8/2017 e-mail from Papes; review attachment, e-mail to Stjepan to correct .1	375.00/hr	37.50
12/9/2017 e-mail from Papes, save his revised signed Certificate .1	375.00/hr	37.50
12/10/2017 e-mails from and to Stanko Tansek re his information .2	375.00/hr	75.00
12/11/2017 Gathering information on business entities for Initial Disclosure, Rule 26 5.0	75.00/hr	375.00

Gregor Lesnik

Page 41

	<u>Rate</u>	<u>Amount</u>
12/11/2017 e-mail from Gregor, save signed Certificate .1	375.00/hr	37.50
Complete FOIA to State Department for Lesnik, same for Papes, save to pdf, e-mails to State Department 1.0	375.00/hr	375.00
Research Kaggle spreadsheets for H1B visa applications; download and save spreadsheet, review and analyze data 1.0	375.00/hr	375.00
Receive and save forwarded e-mails of Robert Vuzem to supervisors to not tell employees the hours worked; translate same, analyze significance .2	375.00/hr	75.00
prepare initial 17 pages very rough draft of Rule 26 Disclosure 1.5	375.00/hr	562.50
12/13/2017 Gathering information on business entities for Initial Disclosure, Rule 26 7.75	75.00/hr	581.25
calls with Stjepan .5	375.00/hr	187.50
e-mails with Papes, save Odvetnik Aleksics request to court to dismiss Slovenian action; save English translation of request to court; save English translation of Aleksic e-mail to opposing attorney Stanislave; e-mail to Aleksic .5	375.00/hr	187.50
Discuss defendant management information .1	375.00/hr	37.50
E-mail from Palmer, review Op-Ed piece .1	375.00/hr	37.50
E-mails between Chen and Dr Chow re Chen documents and statement .1	375.00/hr	37.50
12/14/2017 Gathering information on business entities for Initial Disclosure, Rule 26	75.00/hr	525.00
e-mail from Aleksic explaining defendant Vuzem response to Slovenian court request to dismiss .1	375.00/hr	37.50
Prepare for call to Palmer; e-mail to Palmer .2	375.00/hr	75.00
Review defendant profile and company information .1	375.00/hr	37.50

Gregor Lesnik

Page 42

	<u>Rate</u>	<u>Amount</u>
12/14/2017 Save documents re Primuzic as supervisor and as convicted trafficker .2	375.00/hr	75.00
E-mail to Papes re Krunoslav Premuzic .1	375.00/hr	37.50
12/16/2017 discuss additions to employee lists .1 (no charge)	375.00/hr	NO CHARGE
12/17/2017 call with Stjepan Papes .5	375.00/hr	187.50
12/18/2017 Research and gather information on business entities for Initial Disclosure, Rule 26 6.5	75.00/hr	487.50
add to rough draft of Rule 26 Disclosure 1.0	375.00/hr	375.00
Research re current company of convicted Croatian trafficker Krunoslav Premuzic, save information re GNS, d.o.o. and directors including Leon Galun .6	375.00/hr	225.00
Save information re USCIS Director Francis Cissna .2	375.00/hr	75.00
Locate, save, and analyze CRS Report for Congress on Hurricane Katrina-related immigration issues and legislation .7	375.00/hr	262.50
Update, add to, and revise memorandum re damages calculation 1.5	375.00/hr	562.50
E-mails with Palmer re corrections to proposed documentation .1	375.00/hr	37.50
E-mail to Palmer re damages .1	375.00/hr	37.50
E-mails with Desai re consultation and information .2	375.00/hr	75.00
Locate and save form to request Croatian court records re Premuzic .1	375.00/hr	37.50
12/19/2017 Research and gather information on business entities for Initial Disclosure, Rule 26	75.00/hr	75.00

Gregor Lesnik

Page 43

		<u>Rate</u>	<u>Amount</u>
12/19/2017	Gather information re US State Dept, foreign Affairs Manual and Handbook, save to server	75.00/hr	225.00
	call with Nimish Desai; e-mails to Desai re damages and re basis of FCA claim; e-mail from Desai, save attachments re Infosys .9	375.00/hr	337.50
	Locate, download, and save Foreign Affairs Manual and subparts of FAM, and parts of FAH (handbook), direct staff to complete download and compilation, analyze same 2.0 (partially charged)	375.00/hr	750.00
	review and revise damages calculations memorandum .5	375.00/hr	187.50
	E-mail from Palmer referring to non-intervened claims .1	375.00/hr	37.50
	Research re counsel involved in prior litigations .2	375.00/hr	75.00
12/21/2017	prepare for teleconference re pending claims and association of counsel; memo to file 1.0	375.00/hr	375.00
	E-mail to Webber re Breitbart article .1	375.00/hr	37.50
12/26/2017	Research and gather information on business entities for Initial Disclosure, Rule 26 2.	75.00/hr	150.00
	save DS-4240 Certification of Identity .1	375.00/hr	37.50
	add to draft Rule 26 Disclosure 1.0	375.00/hr	375.00
12/28/2017	Research and gather information on business entities for Initial Disclosure, Rule 26 December 28, 2017 7	75.00/hr	525.00

Gregor Lesnik

Page 44

	<u>Rate</u>	<u>Amount</u>
12/28/2017 e-mails with State Department re FOIA .1	375.00/hr	37.50
Discuss research of defendant entity corporate officers; review list, direct contact with clients .2	375.00/hr	75.00
1/2/2018 Research and gather information on business entities for Initial Disclosure, Rule 26 December 28, 2017 7	75.00/hr	525.00
review additions to draft Rule 26 Disclosure .2	375.00/hr	75.00
1/4/2018 Research and gather information on business entities for Initial Disclosure, Rule 26 December 28, 2017 7	75.00/hr	525.00
locate Congressional Testimony re impact of high-skilled immigration on US workers; download, save and review .3	375.00/hr	112.50
1/6/2018 research sample FOIA complaint and Vaughn motion, save drafts .5 Locate and save Fact Sheet for Wage Requirements under the H-2B visa issued by US Dept of Labor .4	375.00/hr	337.50
1/7/2018 call with Stjepan Papes 1.0	375.00/hr	375.00
1/8/2018 Receive and review Order Granting Administrative Motion to Unseal Second Amended Complaint and for Related Relief filed on January 8, 2018	375.00/hr	37.50
e-mails with Papes about contacts with and availability of Odvotnik Marijan Aleksic .1	375.00/hr	37.50
1/9/2018 receive e-notice and save Order unsealing Second Amended Complaint .2	375.00/hr	112.50
e-mail to attorneys Webber and Azorsky attaching Order unsealing SAC .1		
1/11/2018 Receive and review letter from US Department of State re requested documents	375.00/hr	37.50
second letter from US Department of State re requested documents		

Gregor Lesnik

Page 45

	<u>Rate</u>	<u>Amount</u>
1/11/2018 e-mail to Odvotnik Aleksic re Papes .1	375.00/hr	37.50
1/12/2018 Prepare for service on all 35 defendants 7.	75.00/hr	525.00
save e-filed SAC, docket; locate defendant address information, revise and complete Summons for each defendant; e-file proposed Summons, receive e-notice, save e-filed all Summons, save filed proposed Summons for 35 defendants 1.0	375.00/hr	675.00
Save e-filed certificate of service of draft Summons; save Notice of No Objection to Unseal SAC .1		
round table conference with Alex Weyand, Ben Young, Eric Shaw, Guy Campisano, and Jon Heim .5 (partially charged)		
vm to Kim Friday, e-mails to and Kim Friday at USAG Office re analysis of potential damages .2		
1/15/2018 prepared draft e-mail to One Legal for service of process .2	375.00/hr	225.00
E-mail to Stjepan re Croatian lawsuit, and need for dismissal without prejudice .2		
E-mail to clients re status, unsealing of SAC, and service .2		
1/16/2018 Prepare for service of Summons and Second Amended Complaint. 7.	75.00/hr	525.00
conduct PACER search for other lawsuits involving Eisenmann, locate Eisenmann lawsuit involving Durr; locate Palmer v Eisenmann docket and complaint, download complaint, election not to intervene, Order unsealing complaint; other unrelated lawsuits; evaluate affect of Palmer complaint on our lawsuit 1.0	375.00/hr	862.50
E-mail to OneLegal re service requests .5		
Locate and save Mercedes Benz US International Inc Statement of Information filed with California Secretary of State .2		
Call Rapid Legal re service, prepare e-mail to Rapid Legal .4		
Research service statute for South Carolina; add to draft service memo to Rapid Legal .5		
Update Service spreadsheet .5		
E-mails with Palmer re South Carolina filing .1		

Gregor Lesnik

Page 46

	<u>Rate</u>	<u>Amount</u>
1/17/2018 Prepare for service of Summons and Second Amended Complaint. 5	75.00/hr	375.00
update list of defendants in alpha order .2	375.00/hr	600.00
Call with One Legal re service .1		
Review and revise service list in Los Angeles .2		
Review and revise service list and memo to One Legal; review updated service request .2		
Review and revise service list and memo for South Carolina .2		
Review and revise service list and memo for Delaware .2		
Receive e-confirmations (8) from One Legal, call One Legal re timing of when to serve; save memo of second services batch to One Legal .3		
Scan and save letter from State Department re FOIA for Gregor Lesnik records; same re Papes records .1		
E-mail to Brandywine Process Services .1		
1/18/2018 e-mails with Bill Fuller, call with attorney Bill Fuller and Guy Holton re status, law that cannot have multiple relators, damages evaluation, South Carolina as potential venue, and newest plant buildouts; memo to file .5	375.00/hr	2,062.50
E-mail to Fuller attaching Second Amended Complaint .1		
Research re Mark Krikorian .1		
Research re Julie Myers .1		
Research re John Sandberg .1		
Research re immigration enforcement actions .1		
Research current employment of Melanie Proctor .1		
Locate information for Kevin Dunn of Brandywine Process, E-mails with Brandywine Process, receive POS of Volvo and John Deere, direct filing of proofs of service, receive e-notice of filing POS, save .5		
Calls with docket clerk Diane Miyashiro re Summons, issuance of Summons, and backlog with clerks office .2		
Calls with One Legal about Summons and service .2		
Begin draft translation to Slovenian 2.0		

Gregor Lesnik

Page 47

		<u>Rate</u>	<u>Amount</u>
	Receive e-notice of issuance of Summons, download and save, print; sort pdf copies for individual defendants (35) .3 (partially charged) e-mail from docket clerk, e-mail to clerk .1 E-mails from One Legal about in progress services .2 multiple calls with One Legal re replacement Summons, e-mails to One Legal .7 Update service spreadsheet .2		
1/19/2018	Receive from One Legal multiple (12) e-mails about status of service .1 receive One Legal copies of proofs of services, save; e-mails and calls with One Legal re service of issued Summons 1.0 (partially charged) update service spreadsheet .2 Continue with draft Slovenian translation 1.0 Prepare detailed status report, translate status report to Slovenian; E-mail to Stjepan, Gregor, Danijel and attorney Webber of detailed report on status of case and anticipated further activities 2.0	375.00/hr	1,612.50
1/20/2018	call with Stjepan; e-mail to Stjepan re translator 1.2 E-mail to UK Process .1 E-mail to Odvetnik Marjan Aleksic .1	375.00/hr	525.00
1/22/2018	Review case status .5	75.00/hr	37.50
	review and complete letter to UK Process .1 E-mail from Webber and Nemeth re draft motion to sever wages claims, download and save .2 Discuss service status .2 E-mails with Papes re bills associated with taxes .1	375.00/hr	225.00
1/24/2018	review proofs of service, identify issues with service of correct issued Summons, calls with One Legal, memos to file .5 (partially charged) e-mail from Aleksic, e-mail to Stjepan .1	375.00/hr	262.50

Gregor Lesnik

Page 49

	<u>Rate</u>	<u>Amount</u>
e-mail to translator Sandra Bojic .1		
1/28/2018 revise proposed brief in support of motion to sever 1.0	375.00/hr	375.00
1/29/2018 Calls to One Legal, memos to file 1.5	75.00/hr	412.50
Organize and recorded status of all served defendants 4.		
Receive and review Letter from CT CORP re Eisenmann SE	375.00/hr	37.50
Receive from One Legal multiple e-mails about status of service .1	375.00/hr	75.00
Research bases for recovery of prevailing wages .2		
Complete letter to UK Process .1		
E-mail to Webber and Nemeth of revised proposed brief to sever with explanation of changes .3		
Call with attorney Nadelson on behalf of New Mexico based Phoenix Mechanical, e-mail to Stjepan about Phoenix Mechanical entity; e-mail from Stjepan; conduct internet search re Candace Pottorff DuSaules, research re South Carolina probate statutes of limitations; memo to file 1.0		
Prepare narrative memo re status of service .3		
Prepare draft request for extension of time to serve .2		
E-mails with UK Process .1		
Call with One Legal re service .2		
Call with Tara Heintz, counsel for Deere and Company, memo to file re phone call and re local rules .3		
Review service memos, e-mail to Heintz .1		
1/30/2018 Call from One Legal and went over entities served, memo to file .6	75.00/hr	67.50
Worked on service issues 3.		
calls with One Legal about service and as required re-service with issued Summons .2	375.00/hr	1,200.00
E-mail from attorney Heintz for Deere and Company		

Gregor Lesnik

Page 50

	<u>Rate</u>	<u>Amount</u>
.1 Save CT and CSC rejections of service		
.1 Call with Padraic Foran for Tesla, e-mail from and to Foran confirming agreement re service and extension of time to respond to Second Amended complaint		
.3 Call with Jessie Miller for VW; e-mail to lee and Miller		
.2 E-mail to One Legal to remove parties from re-service request of issued Summons		
.1 E-mail to attorney Heintz re service of Summons prior to issuance, and re-service with issued summons		
.1 E-mail to One Legal re remaining needed re-services, needed declarations of due diligence		
.2 E-mail from Webber of red-lined draft of brief in support of motion to sever		
.2 Review call to attorney Bernstein, call to attorney Desai		
.1 Review multiple district court instructions for requesting summons, save FAQs		
.1 (partially charged) detailed e-mail to attorneys Webber and Nemeth about litigation plan, wages claims, and status		
.4 Review ND General Orders, Complete Administrative Motion to Enlarge Time to Serve, prepare proposed Order, convert to pdf, e-file		
1.0 Review memo of call from Aaron Bernay for Eisenmann Corp		
.1		
1/31/2018 Several calls with One Legal, memos to file		112.50
.5	75.00/hr	
Get overseas docs ready for service, prepared letter shell for service		
.5		
Update service spreadsheet		
.5		
receive multiple e-mails re service, and review multiple proofs of service,		487.50
.2	375.00/hr	
Receive e-confirmation of filing administrative motion		
.1		
Research local rules, print copy for chambers, direct delivery to court		
.2		
Research Rule 4 and requirements for service in Poland		
.2		
Prepare letter to CT Corp re service on Volvo		
.3		

Gregor Lesnik

Page 51

	<u>Rate</u>	<u>Amount</u>
Direct updates to service spreadsheet .2 E-mails with counsel for VW .1		
2/1/2018 call with Christine Webber 1.0 receive, review and revise basic details of draft brief in support of motion to sever .5	375.00/hr	562.50
US ex rel Lesnik e-mail from potential associate counsel Hancock, e-mail to Papes, texts with Papes, forward to new e-mail address .2 Prepare retainer, e-mail to Papes .3 (no charge)	375.00/hr	NO CHARGE
2/2/2018 Receive and review Order Granting Administration Motion to Enlarge Time to Serve Second Amendment Complaint filed on 2-1-18	375.00/hr	37.50
call with Chuck Lee, Call In 800-747-5150, direct is (423) 785-8214 .4 Save and review service documents re Keystone .1 E-mails from One Legal with confirmation report for services of process, review .1	375.00/hr	225.00
2/3/2018 organize notes re defendants and service .5 (no charge)	375.00/hr	NO CHARGE
2/4/2018 organize file 1.0 (no charge)	375.00/hr	NO CHARGE
2/5/2018 call from Jeremy Byrum of McGuiWoods LLP, memo to file .2	75.00/hr	15.00
2/6/2018 e-mail from Papes, prepare and save memo re Branko Tomas arranging for jobs for HRID-Mont to work in Michigan .2 Call with attorney Tara Heinz of Morgan Lewis re extension of time request, e-mails re proposed stipulation to extend time to answer, save, sign, confirm authorization to file .8 E-mail from Bojic re completing translation to Croatian .1	375.00/hr	412.50
2/7/2018 Prepared memos of WCD research .5	75.00/hr	37.50

Gregor Lesnik

Page 52

	<u>Rate</u>	<u>Amount</u>
2/7/2018 save Deere stipulation to extend time to respond		525.00
.1 research re local rules for stipulations to change time	375.00/hr	
.1 Review notes identifying witnesses, employers, locations and time periods compared to Facebook posts		
.2 E-mails with One Legal re service; identify by name digital copies of service documents, evaluate service on named Labor Subcontractors under fictitious names		
.5 E-mail from and to attorney Bernay for Eisenmann re requests for both Eisenmann and Tesla for extensions of time, and re foreign entity appearance		
.1 E-mail from attorney Foran of Tesla accepting service of Summons		
.1 E-mails from and to attorney Byrum for Mercedes enclosing shell for stipulation to extend time		
.2 E-mail to attorney Heintz for Deere & Co attaching further copy of signature page to stip for extension of time		
.1		
2/8/2018 Updating pos info., calls to One Legal, memos to file		307.50
4.	75.00/hr	
Call from attorney Bernay re Eisenemann, memo to file		
.1		
review POS of Mercedes and of Keystone, direct update to service spreadsheet	375.00/hr	450.00
.2 Call with attorney Bernay for Eisenmann		
.2 Call with One Legal re service		
.1 E-mails with translator Bojic		
.1 E-mail for London service on Magma entities		
.2 Calls with, check proof of service for, and e-mail to attorney Natelson for Phoenix Mechanical		
.4		
2/9/2018 Review emails and update service spreadsheet, prepare POS Shell with updated information	75.00/hr	75.00
1.		
Call from Mr. Byrum who represents Mercedes Benz recorded to file .1	75.00/hr	15.00

Gregor Lesnik

Page 53

	<u>Rate</u>	<u>Amount</u>
Call from Regina Petty who represents Wax Fabrication recorded to file .1		
2/9/2018 call with Jeremy Byrum .2 Receive payment instructions for translation, issue payment, save transaction .1 Review vm from Regina Petty for LaX, save, update address list; e-mail from Petty, e-mail to Petty granting extension of time .2 E-mail from atty Foran, Prepare stipulation for Tesla to extend time to respond, sign stipulation, e-mail to Foran .3 E-mail from Foran .1 E-mails with attorney Chuck Lee .1 Email from and to translator Bojic .1	375.00/hr	412.50
2/10/2018 call with Michael Dresser re London service .2 E-mail from translator Bojic .1 E-mail to Travancic of detailed instructions for service of process on seven entities and two individuals in Croatia and Slovenia .5 E-mails re Mos still at Tesla, and service at all locations .2	375.00/hr	375.00
2/11/2018 draft and save stipulations for Rehau and for Mercedes Benz .2 revise brief in support of motion to sever .3 Research FRCP and Local Rules for motion for leave to file amended complaint .2 E-mail to and from atty Jeremy Byrum for Rehau re extension of time and stipulation .2	375.00/hr	337.50
2/12/2018 call with Chuck Lee .2 call with Michael Dresser re London service .1 Research and save drafts for future motion for issuance of subpoenas .2 Update counsel list .1 Call with attorney Lee, e-mail from Lee .2 Call to Foran, e-mail from Foran requesting Plaintiff file stipulation for Tesla	375.00/hr	787.50

Gregor Lesnik

Page 54

	<u>Rate</u>	<u>Amount</u>
.1 Scan, save, prepare to e-file extension of time for Tesla		
.1 Research FRCP and local rules, locate AO 399 Waiver of Service of Summons, prepare for VW of America, prepare letter to attorney Lee, e-mail to Lee		
.8 Review call from Scott Carvo for Dicastal		
.1 E-mail to attorney Petty enclosing draft of stipulation to extend time		
.1 E-mail from attorney Byrum re service on Mercedes-Benz and Daimler AG		
.1		
2/13/2018 update service file, calls with One Legal, memos to file, update spreadsheet		450.00
6.	75.00/hr	
update service spreadsheet		450.00
.2	375.00/hr	
Call with One Legal re service		
.2 Review and save declaration of due diligence for service on Vuzem USA, Inc.		
.1 E-mail from Papes re Magna entity		
.1 Call with Stjepan Papes re names of other labor contractor entities		
.1 Research information for Magna entities, save reports, new releases, and annual reports		
.6 E-mail to Papes re WCD observing two males wearing Tesla jacket and wearing We-Kr jacket on street in San Jose today		
.1		
2/14/2018 Sort out serving issues, worked on Spreadsheet		450.00
6.0	75.00/hr	
2/15/2018 e-mails with Papes and Lingua Soft, e-mail from Lingua-Soft d.o.o. re proposal		225.00
.2	375.00/hr	
receive from Bojic and save Second Amended Complaint translated to Croatian, print copy, review same		
.2 Save invoice		
.1 E-mails with attorney Bill Fuller re consultation		
.1		
2/16/2018 research, locate and save handbook re asylum		112.50
.1	375.00/hr	
E-mail to Lingua-Soft re translation into Slovenian		
.1		

Gregor Lesnik

Page 55

	<u>Rate</u>	<u>Amount</u>
E-mail from Bernay for Eisenmann Corporation, review attached proposed stipulation .1		
2/17/2018 prepare Declaration of William C. Dresser in Support of Motion by Plaintiffs and Relators to Sever Claims including Memorandum in Support of Motion .9 Prepare Notice of Motion and Motion by Plaintiffs and Relators to Sever Claims including Memorandum in Support of Motion .3 Review local rules and Judge Kohs standing orders, Convert drafts to pdf and e-mail to co-counsel with explanation letter .3	375.00/hr	562.50
2/18/2018 prepare draft of e-mail to Papes re information for service on entities in Croatia, review, compare with service spreadsheet, complete and e-mail .2	375.00/hr	75.00
2/19/2018 Prepared hard files for the 35 defendants, working on spread sheet and working with One Legal, memos to file 5.0	75.00/hr	375.00
e-mail with Webber re representation and co-counsel status, and re revisions to motion and calendaring of motion to sever .2 E-mail from Desai re slow response due to bright of child; call with and e-mails with attorney Desai re potential co-counseling and case status .6 E-mail from and to Papes re serving We-Kr at correct address; e-mail to Papes attaching Summons .1 Discuss and update service spreadsheet .1 E-mail from Papes re VV Mont .1	375.00/hr	412.50
2/20/2018 Calls with One Legal re status, memos to file .5 Prepared draft Declaration re Service .8 Worked on Spread Sheet 2.0	75.00/hr	247.50
prepare for counsel for VW Notice of Waiver of Service, scan, e-mail .1 Prepare and save POS for ISM Vuzem USA .1 E-mail to and from Courtroom Deputy Irene Mason - and all defense counsel with address information - about scheduling hearing on motion to sever claims, calendar hearing date and filing due date .3 E-mail from attorney Lee re revising Rule 4 waiver	375.00/hr	675.00

Gregor Lesnik

Page 56

	<u>Rate</u>	<u>Amount</u>
.1 Research mailing and street addresses, save Eisenmann postings, remove unrelated search data, update service spreadsheet, Prepare waivers of service for Eisenmann entities, .7 E-mail to attorney Chuck Lee re VW entities .1 Prepare draft Proof of Service list for counsel with contact information .4		
2/21/2018 Calls with One Legal re status, memos to file Preparing Proofs of Service for filing, updating spreadsheet 5.0	75.00/hr	375.00
save POS on Rehau .1 E-mail from Lee re executed Rule 4 waiver, save .1 Save for filing POS on Daimler AG, on Eisenmann Anlagenbacu Gmbh & Co KG, Eisenmann Verwaltung, Eisenmann SE, and Eisenmann Corporation, Mercedes International, Keystone, LaX, VW, VW Group of America Chattanooga, Tesla, John Deer, and Volvo Car Corporation and non-service report for ISM Vuzem USA and Vuzem USA 1.0 E-mails from and to translator Sandra Bojic .1 E-mail to attorney Bernay, e-mail from Bernay, save signature page, sign, scan signature page, organize for e-filing .2 Revise draft declaration in support of motion to sever California wages claims .1 Prepare draft declaration re status of service .2 E-mail from One Legal, Save to file POS on Citic Dicastal Co .1 Complete Motion to Sever and Declaration, prepare Proposed Order, save and convert to pdf for filing, e-file motion .4 E-file Proofs of Service .2 Receive, save, and print e-filed pleadings .1 (partially charged) research decisions re false claims act claims; download and save decisions 1.0 (partially charged) e-mail to Lingua-Soft .1	375.00/hr	1,387.50
2/22/2018 Calls with One Legal to get remaining POS, memo to file .4	75.00/hr	630.00
Prepared Waiver of Service for Eisenmann SE, Eisenmann Anlag., Eisenmann Anlag. Verwalt, ISM Vuzem doo, ISM Vuzem USA, Gregurec, LB		

Gregor Lesnik

Page 57

	<u>Rate</u>	<u>Amount</u>
Metal and 13 others 5.0		
Researched postal charges and international postal rules in various countries 3		
2/22/2018 research, locate and save addresses for Eisenmann entities, prepare Rule 4 waivers of service, direct staff to complete waivers of service for all defendant entities, review waivers, discuss postage for international mailing, organize waivers and envelopes, update service spreadsheets and assist staff with the same 3.0 E-mail to Judge Koh of proposed Order .1 E-mail to Webber and Nemeth attaching motion, declaration and Order and advising of local rules concerning scheduling motion .2 E-mail to Lingua-Soft re payment .1 (no charge)	375.00/hr	1,237.50
2/23/2018 receive e-notice of CMC, calendar same, forward to attorney Nemeth and Webber .1 e-mails from and to Nemeth re calendaring and re CMC .1 E-mail from and to Foran re motion to sever .1	375.00/hr	112.50
2/24/2018 direct scan of waivers of service .1 Memo re workers compensation insurance verifications .1 e-mails with Papes about status of services .1	375.00/hr 375.00/hr	75.00 37.50
2/26/2018 Call from Attorney Fanning re Keystone Automotive, memo to file, update POS .3 Updated POS and POS Shell.212 .3 Researching postal services 2 call with attorney Fanning for Keystone, memo to file .2 Call with attorney Jessie Miller for VW .1 E-mail to and from Nemeth re scheduling of hearing date .1	75.00/hr 375.00/hr	195.00 150.00

Gregor Lesnik

Page 58

	<u>Rate</u>	<u>Amount</u>
2/27/2018 Call from attorney Fanning re Keystone, memo to file		127.50
.2	75.00/hr	
FedEx information		
1.0		
Post Office information		
.5		
organize records re service		NO CHARGE
1.0 (no charge)	375.00/hr	
2/28/2018 Researched for mailing in Slovenia, Germany, Poland, and Croatia		450.00
1.0	75.00/hr	
Prepared final mailing list for 20 defendants		
2.0		
Prepared FedEx mailings for 20 defendants		
1.0		
Gathered Summons, Complaints, Waivers and return mailings for 20 defendants and prepared for Post Office		
2.0		
Call to One Legal re Service		
Review and save waivers of service; scan envelopes, scan waivers and envelopes and assist staff with the same, mail waivers; scan and save receipts for mailing	375.00/hr	862.50
1.5		
update service spreadsheet, memo re declaration concerning status of service on all debts		
.5		
call with Danijel Travancic re status of service and procedures		
.2		
E-mail from attorney Jessie Milller, review voice mail		
.1		
3/1/2018 Calls with One Legal, memo to file		112.50
.5	75.00/hr	
Prepared Waivers		
.5		
Gathered Summons, Waivers and Complaints and served 4 entities		
.5		
Printed and organized Second amended complaint for damages (4 copies)		7.50
.1	75.00/hr	
e-mails with and call with Stjepan Papes re Keystone		560.00
.2	400.00/hr	
Review e-mails, translate same, Prepare shell proof of service on VV-Mont		
.2		
Receive confirmation reports of services		
.1 (partially charged)		
prepare letter and e-mail to attorney Fanning		
.1		

Gregor Lesnik

Page 59

	<u>Rate</u>	<u>Amount</u>
E-mail from Fanning re Keystone Automotive .1 Discuss with staff tasks to locate, research and save defendant and defendant representative contact information especially for Vuzem entities .1 (partially charged) prepare, scan and save envelopes and letters to Vuzem American entities and Branko Tomas at multiple locations .3		
E-mail from Nenad Modic re contact information .1 E-mail from Travancic to Modic .1 E-mail from Papes re service on VV Mont .1		
3/2/2018 call with atty Fanning re Keystone .3 Call to Christine Webber re affect of severance on their representation and on discovery issues .1	400.00/hr	160.00
3/3/2018 call with attorney Manning, e-mail to Manning for Keystone .4 E-mail to UK Process re locations for service on Gregurec .1 E-mail to Modic re service and addresses .1 Review e-mail from attorney Miller for VW, save attached letter re motion to sever .1 Forward to attorney Webber re inquiries on motion to sever .1 E-mail to attorney Miller for VW .1 Review e-mails from One Legal re service .1 Receive and save e-notices of VW Statement of Interested Persons .1 Locate, save and review Judge Koh standing orders for bench trials, for jury trials, and standing orders for all judges .2 Locate, save and review Model Jury Instructions for Ninth Circuit 2017 edition; locate jury instructions for reverse FCA, save; locate FCA Primer for DOJ, save; locate other publications for FCA, memo .5 Research FOIA opinions policy, save memo .2 Research ambiguity as a defense, save memo .1 Research authorities re willful blindness as satisfying element of intent, save authorities .2	400.00/hr	1,200.00

Gregor Lesnik

Page 60

	<u>Rate</u>	<u>Amount</u>
Research due diligence for corporate liability .1		
Research benefit of bargain damages for FCA, save authority .1		
Receive e-notice and save appearances pro hac vice and applications for Lee, for Eiselstein, notice of appearance for VW Chattanooga Operations .2		
Locate, download, save and review Civil Local Rules effective January 2018; research applications to appear by phone; locate and save exemplar application to appear by phone .3		
3/5/2018 Receive and review letter from Jesse Miller re motion letter from Craig Annustriziata requesting a time to talk and clear up confusion.	400.00/hr	40.00
complete detailed evaluation report on viability of wages claims and theories under various state laws and who is liable in current action; call Christine Webber, memo to file; e-mail to Webber to confirm consensus on dismissal of some defendants under Second Cause of Action, e-mail from Webber, prepare draft requests for dismissal, e-mails with Webber re form of requests for dismissal without prejudice as to some defendants of Second Cause of Action 1.5	400.00/hr	1,240.00
call Jessie Miller .4		
call with Colin West for BMW .2		
Organize to file POS on We-Kr .1		
Research Tennessee corporate information for Mos Service LLC, save articles .1		
Discuss updated service spreadsheet, discuss questions for One Legal to followup on service .1		
Receive and save Second Amended Complaint translated into Slovenian, skim review same .2		
Update mailing list .1		
Prepare draft dismissals .3		
E-mail from Papes re service on We-Kr in Ivanec, Croatia by service on Drago Krizanec, brother of owner Ivan Krizanec; save Proof of Service .1		
3/6/2018 Call from attorney Heintz, memo to file .3	75.00/hr	22.50

Gregor Lesnik

Page 61

	<u>Rate</u>	<u>Amount</u>
3/6/2018 Update Proofs of service .3	75.00/hr	322.50
Update, spread sheet, prepare separate memo with attachments regarding changes to Complaint 4		
call with Tara Heinz, counsel for defendant.2 Review One Legal memo re unsuccessful service .1 Review, revise and complete partial dismissals of Second Cause of Action, counts 1 and 2, convert to pdf, e-file, receive e-notice of filing.2 (partially charged) review BMW requested dismissal with prejudice.1 Review investigations and internet information re Magna and Magma entities, discuss with staff; save internet website for Magna entities, locate and evaluate potentially related Magna entities.3 Review investigations and internet information re shell Mos Service entity in Tennessee.1 Research, locate, save and analyze other ND California orders on motions for judgment on pleadings .2 E-mails with attorney Bernay for Eisenmann entities re motion to sever and scheduling briefing.2 E-mail with Colin West re substituting BMW Manufacturing Co, LLC.1 Locate other US based BMW entities that attorney West represented.1 Locate and save corporate information re HRID-Mont doo, conduct google maps search, save address.1 Save proof of service on VV Mont.1 Receive and save e-notice of filing proofs of service on VV Mont, and on We-Kr.1 Receive and save e-notices of Orders approving pro hac vice applications.1 Research Alabama statutes of limitations on wages claims.2 Research and save Alabama decision re unjust enrichment cause of action, class actions under Alabama law including commonality issues on alternative theories for wages recoveries including fraud and unjust enrichment; save multiple decisions, articles and blogs re same.1.0 Locate, save and analyze Wage and Hour Law Overview for FLSA claims.3 Update proof of service.1 Research Slovenia business register for LB Metal doo, for D2N, and their registered partners and authorized representatives.3 Research quantum meruit claims under Michigan law.4 Research right to control and other bases for determining who is an employer, memo to file.3 Update Overview Memorandum re wages based claims in all jurisdic	400.00/hr	2,640.00
3/7/2018 Update files, spreadsheet, and folders, sort and organize new documents for all defendants 5.0	75.00/hr	375.00
save research re right to control; review, revise and index memorandum of wages and hours claims, alternative theories of recovery, and class action certifications under Alabama, California, Michigan, South Carolina and Tennessee laws	400.00/hr	1,680.00

Gregor Lesnik

Page 62

	<u>Rate</u>	<u>Amount</u>
--	-------------	---------------

2.0

Save e-mail from Bernay about extension of time to respond to motion to sever, save stipulation, application, proposed Order,

.2

Review local rules, revise proposed stipulation, e-mail to Bernay re stipulation and re need for his declaration under local rules

.3

Receive Mercedes non-opposition to motion to sever

.1

E-mail from Papes re South Carolina injury

.1

Research BMW entities

.1

E-mail from Bernay, review and save Bernay declaration to support extension of time, save signature page to stipulation, revised proposed Order; sign stipulation, scan, e-mail to Bernay; e-mail from Bernay, save stipulation, declaration and proposed Order for e-filing; e-file; save e-notice of filed stipulation; e-mail to Judge Koh with cc to Bernay, save

1.0

E-mail to Webber re motion to sever, extension of time, and service, as well as re Papes request for explanation of wages claims

.3

E-mail to Webber of filed requests for dismissal without prejudice of specified defendants

.1

3/8/2018	Receive and review Order Granting Stipulation to Extended Time for Defendant Eisenmanns Corporation to respond to Plaintiffs Motion to Sever.	400.00/hr	40.00
	Call from Collins West, memo to file		390.00
	.2	75.00/hr	
	Updating files, reasurching business info on new named defendants,		
	5.		
	receive and save e-notices of LAX Certificate of Interested Entities, LAX opposition to motion to sever, declaration of Mitchell; save LAX Compendium of authorities and index to same; print all pleadings; review same	400.00/hr	560.00
	.3		
	Locate German BMW entity articles of incorporation, save same; save BMW publication re social responsibility		
	.2		
	E-mail from West, receive and save revised stipulation to replace BMW; Prepare proposed Admin motion, proposed order to substitute BMW, prepare to e-file		
	.5		
	Save Daimler annual reports, SEC reports		
	.2		
	Locate and save Deere labor agreement		
	.1		
	E-mail from attorney Fuller re labor cases		
	.1 (no charge)		


Gregor Lesnik

Page 63

	<u>Rate</u>	<u>Amount</u>
discuss and direct save of HRID Mont doo company profile and identification of director, annual report from AJPES .1		
3/9/2018 organize pleadings of last week .5 (no charge) e-mail from attorney West stating desire to not make an appearance and thus to not sign stipulation .1	400.00/hr	40.00
memo re liability against other labor contractors besides Vuzem persons .2	400.00/hr	80.00
3/11/2018 receive and save e-notice of Order extending time on motion to sever .1 Research USAG criminal resource manual re false claims act / qui tam including research and saving summaries for venue for wire fraud; use of mail and wire fraud in RICO and criminal prosecutions, RICO, fraud, materiality, department or agency, false statements, defenses, statutes of limitations, lulling letters 1.0 Make searchable all LAX pleadings .1 E-mail to Webber re status of motion to sever .1	400.00/hr	520.00
3/12/2018 Receive and review Gregurec Ltd, Summons Waiver	400.00/hr	40.00
Case Building 6.0	75.00/hr	450.00
scan to save Gregurec waiver of service of summons .1 Memo re BMW executives .1 Direct locating and saving Dicastal reports, articles and corporate information .2	400.00/hr	160.00
3/13/2018 Organize, track and update files 8	75.00/hr	600.00
3/14/2018 Organize, adding information, track and update files 6.	75.00/hr	450.00
left message for Colin West .1 call with Jeromy Byrum .5	400.00/hr	240.00

Gregor Lesnik

Page 64

	<u>Rate</u>	<u>Amount</u>
3/15/2018 Organize, adding information, track and update files 5.	75.00/hr	375.00
discuss with staff organization of documents by employees and defendant entities .1 (partially charged) locate MDM Employee complaints, save documents .2 Save draft table of contents .2	400.00/hr	200.00
3/16/2018 e-mails with attachments, save, discuss and direct saving documents for proofs of service, review and direct pdf copies to file; prepare certificate of service on Ivan Vuzem, and on Robert Vuzem; update and review pos for Ivan Vuzem and for Robert Vuzem .6 E-mail to Modic .1	400.00/hr	280.00
3/18/2018 evaluate status of services .2 Organize file and source documents 1.0 (no charge)	400.00/hr	80.00
3/19/2018 Receive and review Statement and Second Amended Complaint translated to Croatian FIBULA SLB	400.00/hr	40.00
Plaintiffs and Relators Gregor Lesnik and Stjepan Papes Initial Rule 26 Disclosures 7.0	75.00/hr	525.00
	400.00/hr	2,280.00
Assist in preparing to file proofs of service on Ivan Vuzem and on Robert Vuzem; due diligence for service on Robert Vuzem, proof of service on proof of service on ISM Vuzem doo, proof of service on HRD-Mont .5 Call with Bill Fuller .1 Locate and save documents re site photos, Tesla profile, Tesla officers and employees; Eisenmann officers and employees 1.2 E-mails with Papes re other injured workers .1 Research re discovery production of employee contracts and identity of employees; research limits of disclosure of medical records in workers comp claims documents to employer; memos to file .2 Research regs re I-9 forms .1 Research and save Elon Musk statements re case		

Gregor Lesnik

Page 65

	<u>Rate</u>	<u>Amount</u>
.1 E-mails with Stjepan and Gregor re case in Slovenia		
.2 Prepare draft of Rule 26 Disclosure		
3.0		
3/20/2018 Plaintiffs and Relators Gregor Lesnik and Stjepan Papes Initial Rule 26 Disclosures	75.00/hr	375.00
5.		
Plaintiffs and Relators Gregor Lesnik and Stjepan Papes Initial Rule 26 Disclosures	75.00/hr	375.00
5.0		
discuss with staff locating contact information for Rule 26 Disclosure of witnesses	400.00/hr	560.00
.2 Locate Tesla employee contact information		
.2 Locate Mercedes employee contact information		
.1 E-mails from and to Nenad Modic about proofs of service, review proofs, memo to file		
.2 Update notes for Rule 26		
.2 Investigate and discuss with staff investigation re Gregurec Ltd company information		
.1 Update counsel list and addresses		
.2 Call with attorney Fanning for Keystone		
.1 Call with attorney West for BMW		
.1		
3/21/2018 locate contact information for employees and officers from BMW, Bayern, others; update and add to Rule 26 Disclosure	400.00/hr	920.00
1.0 E-mail with Papes, save attachments from Facebook, add to spreadsheets for workers and defendants		
.2 E-mail to Papes re relevant activities for our lawsuit		
.1 Locate contact information for Eisenmann employees and officers		
.3 Find information for involved but unnamed entities ATX		
.1 Save and respond to e-mails of past week from Danijel Travancic re service		
.1 Save attachments from Modic for service		
.1		

Gregor Lesnik

Page 66

	<u>Rate</u>	<u>Amount</u>
Save information for Davorin Hull, Guardian Glass, Ivancic .1 Call with Stjepan re parties, locations, and relationship to Eisenmann, memo to file .3		
3/22/2018 Receive and review Service packet to Vuzem was returned	400.00/hr	40.00
Continue to add witness information to draft rule 26 disclosure 6.0	75.00/hr	450.00
locate and save jpeg and pdf internet articles and postings for Eisenmann persons 1.4 For Tesla persons .8 For Dicastal and Magna 1.0 For VW .4 For BMW .3 discuss with staff organizing and saving information .1 (partially charged) e-mails (5) from Papes of url addresses for information about witnesses and contracts, locate, view, and save jpg screenshots of information .7 Receive e-notice, save, and review Eisenmann opposition to motion to sever, Tesla joinder, exhibits, and proposed Orders, calendar replies .4 Receive Notices of Appearances, Certificates of Interested Parties for Tesla and for Eisenmann Corporation, evaluate same, download, save and print .2	400.00/hr	2,120.00
3/23/2018 call to Miriam Nemeth .2 Research FLSA instructions for 8th Circuit, save same .3 Research qui tam authorities for 9th Circuit, save Driscoll and Campie decisions .2 Research California and 9th Circuit wages decisions and statutes .3 Prepare memorandum of right to be paid wages for past work performed .4 E-mail from Webber .1 Begin to locate, organize, index for exhibits and save pleadings to support motion .4 Review LAX opposition to motion to sever	400.00/hr	1,480.00

Gregor Lesnik

Page 67

	<u>Rate</u>	<u>Amount</u>
.2 Research defendants cited authorities		
.6 Prepare summary with reference to page lines of pleadings defendants wages arguments		
1.0		
3/24/2018 locate, save and label: Sowder e-mails, complete settlement agreement with all signatures, defendant drafted requests for dismissal, Joint Request for Dismissal, revised stipulated joint stipulation, supporting declarations and complaints for Alameda Superior Court actions; Application for Adjudication of Claim, Order approving C & R for workers comp proceeding; save, convert to pdf and label for exhibits	400.00/hr	3,560.00
4.0 Research statute of limitations analysis in opinion, memo to file		
.4 Add to draft Declaration in support of motion to sever		
1.5 Add to Reply MPA in support of motion to sever		
3.0		
3/25/2018 Add to summary of state laws	400.00/hr	3,920.00
1.0 Research cases re argument of bar by prior action		
.6 Research RICO pleadings authorities, Pinkerton doctrine, predicate acts, and immigration law bases for cause of action, save authorities, memo to file		
1.2 Research procedures to settle FLSA claims		
.3 Research regs and statutes for determining employer under FLSA		
.4 Further add to summary of state laws		
.3 complete Reply Declaration		
.9 Prepare cover pages, organize and attach exhibits		
.7 Complete draft reply MPA		
4.2 e-mail draft reply brief and declaration to Cohen Milstein		
.1 E-mail research memoranda to Cohen Milstein		
.1		
3/26/2018 Continue to add witness information to draft rule 26 disclosure	75.00/hr	600.00
8.0		
locate and save Vuzem entity information including for Branko Tomas, save print screens	400.00/hr	2,760.00
.4 Discuss with staff updates to service spreadsheet		

Gregor Lesnik

Page 68

	<u>Rate</u>	<u>Amount</u>
.1		
Update Memo / list of potential defendants		
.2		
E-mail from Lingua Soft, download and save Slovenian translation of Second Amended Complaint, review same		
.3		
locate and save VW entity information including for officers and directors, save print screens		
.4		
locate and save LB Metal entity information including for officers and directors, save print screens		
.4		
locate and save Volvo entity information including for officers and directors, save print screens		
.3		
locate and save D2N entity information including alternate addresses and for officers and directors, save print screens		
.2		
locate and save HRID-Mont entity information including officer, save print screens		
.2		
locate and save BMW entity information including for officers and directors, save print screens		
.4		
locate and save D2N entity information including for officers and directors, save print screens		
.4		
locate and save Guardian Glass, Cardinal Glass, VW entities information including for officers and directors, save print screens		
.4		
Update memo / list of involved entities not yet named as defendants		
.3		
E-mails to and from Papes re locating Robert and Ivan Vuzem at alternative addresses		
.1		
Assist staff to update service spreadsheet		
.1		
Revise draft Word versions of reply declaration and MPA in support of motion to sever claims		
.3		
E-mail to attorney Nemeth with Word versions of draft reply briefs		
.1		
Prepare draft second administrative motion to enlarge time to serve		
.5		
E-mail from Nemeth, review track changes in Word versions of draft reply briefs, revise briefs, save and convert to pdf, prepare to file reply Declaration and reply MPA, e-file		
1.3		
Receive e-notice, save e-filed briefs		
.1		
E-mail to Nemeth		
.1		

Gregor Lesnik

Page 69

		<u>Rate</u>	<u>Amount</u>
	Review Carleton government website, locate address information, Prepare FOIA to Carleton .3		
3/27/2018	Continue to add witness information to draft rule 26 disclosure 6.0	75.00/hr	480.00
	Filed Mos and ISM Vuzem doo Proofs of Service .4		
	file proofs of service, receive e-notice and save filed POS of Mos Servis, ISM Vuzem, d.o.o., and HRID-Mont .2	400.00/hr	800.00
	Receive e-notice of corrected electronic filing error .1 (no charge)		
	Receive notice and receipt of non-service on D2N tehnologije, d.o.o. .1		
	Receive pro hac vice appearance of Burgett for Eisenmann Corporation, save .1		
	Begin draft Rule 26 Disclosure 1.5		
3/28/2018	Locate server in Hoover, Alabama, memo to file, emails servers, Emailed summons and complaint re D2N to Hoover, Alabama Process Server 1.0	75.00/hr	525.00
	Locate exhibits Administrative Motion to Enlarge Time and assist in preparation of Motion re Vuzem USA, Inc. 4.0		
	Locate exhibits Administrative Motion to Enlarge Time and assist in preparation of Motion re ISM Vuzem USA, Inc 2.		
	add to administrative motion to enlarge time and to serve Vuzem USA, Inc., prepare cover pages, organize exhibits to draft admin motion .7	400.00/hr	360.00
	Locate last contact information for ISM Vuzem USA, Inc., save internet information print screens .2		
	Locate and save POS in Alameda Superior Court action .1		
3/29/2018	Continue to add witness information to draft rule 26 disclosure 4.0	75.00/hr	450.00
	Investigate further D2N Technologies, memo to file, email to Bill 2.0		
	Review status of l/d for MOS Servis, d.o.o., to respond to SAC .1	400.00/hr	840.00
	Locate and save information from Joey D Investigations .1		

Gregor Lesnik

Page 70

		<u>Rate</u>	<u>Amount</u>
	Research address information for D2N listed address in Hoover, AL, general Alabama license, contracting LLC, Cindy {Burrow\par } Holland of Catalyst Contracting, LLC, save internet data 1.8 Review internet articles, E-mails with clients and with witnesses re B-1 worker Bojah Sprah incident at BMW .1		
3/30/2018	call with Ben Wagner and with Biran Lenan of Warner Norcross re CiTic, memo to file .4	400.00/hr	160.00
4/1/2018	2/4/2018 call with attorney Byrum, counsel for Mercedes, save representation and contact information .1 Search for, locate, review Facebook pages, Save facebook and internet information for employees of HRID-Mont doo .7 E-mails with Stjepan Papes, Search for information re Michigan factory, search for, locate, review website and Facebook pages for Guardian Glass, Save facebook and internet information, e-mail to Stjepan 1.0 E-mails with Chuck Lee, counsel for VW .1 E-mail from Bill Fuller re South Carolina venue .1	400.00/hr	800.00
4/3/2018	Receive and review Certified translation from Croatia to Slovenian	400.00/hr	40.00
	Process order for service on Eisenmann SE, Eisenmann Anlagenba, GmbH & Co. KG, Eisenmann Anlagenbau Verwaltung GmbH, Bayerische Motoren Werke, and CiTic Dicastal .75	75.00/hr	56.25
	e-mails to and from Colin West .1 Memo to staff re links for BMW Manufacturing Co, LLC .1	400.00/hr	80.00
4/4/2018	discuss with staff, and e-mail information, re service and parties .3 Review service information for Brandywine to serve Eisenmann entities in Delaware .1 Discuss with staff filing proofs of service .1	400.00/hr	200.00
4/5/2018	Receive and review letter from Village of Carleton re FOIA request	400.00/hr	40.00

Gregor Lesnik

Page 71

	<u>Rate</u>	<u>Amount</u>
4/6/2018 Receive and review POS on Eisenmann SE, Eisenmann Anlagenbau, and Eisenmann AnlagenbauVerwaltung on 4/4/18. Invoice from Brandywine Process Service pos on ISM Vuzem, doo.	400.00/hr	40.00
4/9/2018 Continue to add witness information to draft rule 26 disclosure 5.0	75.00/hr	375.00
conduct internet research and save print screens of information for Deere & Company .3	400.00/hr	520.00
Locate and save print screens of information for Keystone Automotive including relationship to LKQ Corporation .7		
Add to draft Rule 26 Disclosure .3		
4/10/2018 Receive and review Branko Tomas docs Returned	400.00/hr	40.00
Continue to add witness information to draft rule 26 disclosure 5.0	75.00/hr	375.00
US ex rel Lesnik receive, download and save LAX motion to dismiss; MPA Re Jurisdiction, Declaration of Mitchell, and proposed Order .1	400.00/hr	280.00
Receive Application by Bernay to appear pro hac vice .1		
Receive e-mail of Foran enclosing proposed Order, save proposed Order .1		
receive, download and save Tesla motion to dismiss, and proposed Order .1		
receive, download and save Deere proposed Order .1		
Receive e-mail of Giles enclosing proposed Order, save proposed Order .1		
Save e-mails from counsel, counsel out of office, and undelivered e-mails from last two weeks -.1 (partially charged)		
4/11/2018 Calls to Village of Carleton, memos to file .3	75.00/hr	172.50
Continue to add witness information to draft rule 26 disclosure 2		
print and review motions by Tesla, LAX and Deere .5	400.00/hr	1,480.00
Receive LAX joinder in Eisenmann motion to dismiss .1		
Review and save multiple e-mails from counsel to and from Docket Clerk		

Gregor Lesnik

Page 72

		<u>Rate</u>	<u>Amount</u>
	about setting motions		
	.2		
	Receive, download and save Order granting Bernay application to appear pro hac vice		
	.1		
	Review e-notices, update service list		
	.2		
	E-mail from attorneys at Boies, Shiller, download and save redacted and unredacted declarations of West, print, review		
	.4		
	Locate and save photo and posting by Veno Vujic of VV Mont		
	.1		
	Locate and save photo and posting by Vuk Vukobratovic and by VV Mont company		
	.1		
	Research re allegations of fraud under federal pleadings, prepare draft insert for opposition to motion to dismiss regarding fraud		
	2.0		
4/12/2018	Continue to add witness information to draft rule 26 disclosure		375.00
	5	75.00/hr	
	research allegations for private cause of action for trafficking, save memo to file		680.00
	1.0	400.00/hr	
	Receive service receipts for service in Delaware		
	.1		
	Research and save corporation information from Illinois and Ohio		
	.1		
	Evaluate proof on defendants motions based on evidence issues		
	.2		
	Call with Daniel J. Gutierrez re workers compensation information, e-mail to Mr. Gutierrez		
	.2 (partially charged)		
	calendar responsive due dates for multiple motions		
	.1		
	Call with and e-mails with attorney Wagner		
	.1		
4/13/2018	Receive and review letter from CT re Bayerische Motoren Werke is not listed in their records	400.00/hr	40.00
	Downloading from Alameda County Court, enhancement/searchable and print of exhibits for Dresser Dec in Oppo to Def motion to file under seal	75.00/hr	187.50
	Time: 2.5		
	texts with consultant Jay Palmer and attorneys Bill Fuller and Guy Horton		1,480.00
	.2	400.00/hr	
	Call with and e-mail with attorney William F. Abbott re pleadings issues		
	.2		
	E-mail to clients re 12(b)(6) motions and responses and attaching Eisenmann		

Gregor Lesnik

Page 73

		<u>Rate</u>	<u>Amount</u>
	motion to dismiss .2 Call with attorney Wagner fo DiCastale .1 Review and sort Alameda pleadings, scan, save, evaluate actual language of releases, stipulations, and dismissals .5 E-mails to and from attorney Gutierrez .1 Prepare draft insert for MPA re factual allegations supporting coerced labor claims .2 Review and sort workers compensation pleadings re releases and language, save in pdf .2 Prepare draft decl in opposition to Eisenmann administrative motion to file under seal .3 Save exhibit A, prepare exhibit A cover page, add to draft declaration re admin motion .1 Prepare draft insert for MPA re dismissal of claims on basis of settlement terms .4 Locate and save online SJ Mercury News article .1 Locate and save articles re Vuzem .1 Locate and save Malkin on Tesla response .1 Save and name in pdf additional exhibits responsive to Eisenmann admin motion to file under seal, evaluate which are relevant .5 Add to draft MPA in opposition to Eisenmann administrative motion to file under seal .3 E-mails with attorney Bernay re meet and confer .1		
4/14/2018	conduct research on standards for motions to dismiss, memoranda re text for opposition to motions to dismiss 4.5	400.00/hr	1,800.00
4/15/2018	Organized, indexed exhibits for Dresser Dec in Oppo to Def motion to file under seal and updated Dec with exhibits Time: 4	75.00/hr	300.00
	Direct and assist in creating cover pages for exhibits .1 (partially charged) add to draft declaration in opposition to Eisenmann Admin Mtn to file under seal	400.00/hr	960.00

Gregor Lesnik

Page 74

		<u>Rate</u>	<u>Amount</u>
	1.3 Evaluate and research issues on defendants multiple motions to dismiss 1.0		
4/16/2018	receive, direct saving, and direct organization and naming of workers compensation coverage and lack of coverage records for intended Request for Judicial Notice .2 (partially charged) receive further certifications of service, investigate and save Illinois corporate search records .2 Review and pay for services in Illinois .1 (no charge) call with One Legal process serving about proofs of service .1 Add to and revise draft MPA in opposition to Eisenmann admin motion .2 Locate and save Tesla twitter response to SJ Mercury News article .1 Locate and save CBSN internet articles, save in pdf, add as exhibit to opposition to Eisenmann admin motion .2 Locate company responses to CBSN articles, save, add as exhibits .2 Complete penultimate drafts of Declaration and of MPA in opposition to Eisenmann Admin Motion, save to pdf 1.5	400.00/hr	1,120.00
4/17/2018	Continued working on Initial Rule 26 Disclosures 3.0	75.00/hr	225.00
	revise MPA in opposition to Eisenmann motion to dismiss .2 Review organization of documents proving lack of workers compensation coverage .2 Prepare shell for opposition and initial information for opposition to Deere motion to dismiss .3 Prepare shell for opposition and initial information for opposition to LAX motion to dismiss .2 Locate and save information for DiCastale officers .1 Locate and save information for Daimler officers .1 Add to preparation of draft of Rule 26 Disclosure .5 Locate and save information for officers and employees of defendant entities .2	400.00/hr	760.00

Gregor Lesnik

Page 75

	<u>Rate</u>	<u>Amount</u>
E-mail to attorney Gutierrez .1		
4/18/2018 extract facts from Second Amended Complaint for arguments on motions to dismiss 1.5 Research elements for FCA 1.0	400.00/hr	1,000.00
4/19/2018 e-mail from Papes re facts supporting claims .2 Further e-mail from Papes re facts and contacting other workers and witnesses, save, evaluate for impact on motions .2 Evaluate draft Joint CMC Statement .1 Investigate and save Tesla probe re workplace conditions, save internet information .1 Add substantial additions to MPA in opposition to Eisenmann motion to dismiss 2.0 Memo re recent 2018 wage cases and issues .1 Prepare draft Joint Case Management Conference Statement .8 Save statement from Papes, compare to e-mailed information .1	400.00/hr	1,440.00
4/20/2018 Organized, indexed exhibits for WC Ins Verification Alabama and California Time: 3.25	75.00/hr	243.75
receive, save, and prepare to file proof of services on Eisenmann Corporation .1 Machine translate Papes statement .2 (partially charged) add witness identification and contact information to draft Rule 26 Disclosure 2.0 Add to and revise draft MPA in opposition to Eisenmann motion to dismiss 2.0 Add to and revise draft MPA in opposition to Tesla motion to dismiss 2.0 Review index of workers compensation coverage documentation 1.0	400.00/hr	2,920.00
4/21/2018 Organized, indexed exhibits for WC Ins Verification Iowa, Michigan, and South Carolina Time: 2.75	75.00/hr	206.25

Gregor Lesnik

Page 76

	<u>Rate</u>	<u>Amount</u>
4/21/2018 direct organization and saving information as to workers comp coverage .2 (partially charged) Review index of workers compensation coverage documentation .1 (partially charged) research standards on motions to dismiss, save memos for inserting into briefs 1.0	400.00/hr	520.00
4/22/2018 prepare penultimate draft of MPA in Opposition to Eisenmann motion to dismiss 5.5	400.00/hr	2,200.00
4/23/2018 Preparing Exhibits for and assist in preparation for Request for Judicial Notice 8.0	75.00/hr	600.00
research qui tam standards, non-immigrant visa regs, authority for CFR, 1.5 Add further witness information to draft Rule 26 Disclosure 1.8 Prepare draft for circulation of MPA in Opposition to Eisenmann motion to dismiss .8 E-mails with Nemeth and Webber of Cohen Milstein re their deferring to WCD on motions to dismiss .1 Locate and save information to identify locations of Dicastal NA construction project, save internet postings by Dicastal .2 E-mails with attorney Wagner .1 Attempted e-mails to Emily Rand of CBS .1 Discuss with staff digital cover pages and organization of workers compensation coverage documents .1 E-mails with counsel re scheduling Rule 26 meet and confer .1 Review Tesla website privacy policy .1 Research re RICO and conspiracy liability, save article re 9th Circuit decisions .3 Research re policy analysis .1 Locate and save decisions on RICO causes of action .2 Locate and save decisions finding reverse false claims act obligations .2 E-mails with Palmer and Rand, locate and save State Department statement re CBS publication; review same .2 Locate and save decisions finding proof of violations under the FCA; locate and save articles, review and analyze the same	400.00/hr	3,200.00

Gregor Lesnik

Page 77

	<u>Rate</u>	<u>Amount</u>
2.0		
Locate and save Eisenmann press releases		
.1		
Review and complete compilation of exhibits for opposition, save to e-file		
.5		
Prepare proof of service		
.2 (partially charged)		
complete to file declaration in opposition to Tesla motion to dismiss		
1.8		
E-mails between docket clerk and counsel for VW		
.1		
4/24/2018 review status of organizing digital copies of workers compensation coverage documents	400.00/hr	4,120.00
.1 (partially charged)		
research FCA decisions by Judge Koh, save		
.2		
Research FCA decisions, save		
.2		
Research obtaining visa by false statements		
.1		
Research conspiracy under FCA		
.1		
Research obligations found for reverse FCA		
.1		
Research FLSA standards for joint and alter ego employers		
.1		
Prepare shells and initial drafts for oppositions to motions to dismiss by Mercedes Benz and by Rehau		
.3		
Extract facts for Mercedes-Benz US liability		
.3		
Prepare draft of MPA in opposition to motions to dismiss by Mercedes Benz and by Rehau		
1.0		
Add to draft MPA opposition to Eisenmann mtn to dismiss		
.5		
Add to draft MPA opposition to Tesla mtn to dismiss		
.5		
Complete to file MPA opposition to Tesla mtn to dismiss		
.5		
Complete to file MPA opposition to Mercedes and Rehau mtn to dismiss		
.5		
Review index to WC Insurance Verifications		
.1		
Receive and save invoice for services in Illinois		
.1 (no charge)		
prepare to file POS on Eisenmann SE, Eisenmann Anlagenbau GnbH, and Eisenmann Anlagenbau Verwaltung GmbH		
.1		
Research FRCP, review notes to FRCP, prepare request for judicial notice		
.6		

Gregor Lesnik

Page 78

	<u>Rate</u>	<u>Amount</u>
Prepare to file Request for Judicial Notice .2 (partially charged) extract facts re John Deere liability .5 Prepare draft MPA in opposition to Deere & Co motion to dismiss .5 Extract LAX facts .2 Prepare draft MPA in opposition to LAX motion to dismiss .5 Complete and file opposition to Eisenmann motion, including Request for Judicial Notice 1.0 Complete and file opposition to Mercedes Benz and Rehau motion .5 Complete and file opposition to Tesla motion .5 Update notes and inserts for MPA in opposition to motions to dismiss 1.0		
4/25/2018 Locate and save ISM Vuzem and Eisenmann SE officers social media posts .2 Receive e-notice of and VW motion to dismiss, download and save .1 call Jesse Miller, e-mails with Miller .2 Complete and file opposition to Deere motion .5 Complete and file opposition to LAX motion .7	400.00/hr	680.00
4/26/2018 receive applications and orders for pro hac vice and appearances of counsel, save, print, update proof of service list .2 Review PACER docket, save .4 Direct staff in print, save, and organization and filing of pleadings .1 (partially charged) locate and save digital copy of initial Civil Cover Sheet sealed by Order of Court; locate and save digital copy of initial Complaint, print .1 Save e-mails of past week with counsel .1 (partially charged) locate, save to pdf, and organize dismissal documents and stipulations identifying what settlement payments were for .3 Locate and save e-mails re service and service attempts .1 (partially charged) locate invoice for formal corporate records from Agencija Republike Slovenije .1 Receive bill and translation invoice .1	400.00/hr	1,280.00

Gregor Lesnik

Page 79

	<u>Rate</u>	<u>Amount</u>
Discuss with staff obtaining and saving all digital copies of all pleadings; review later digitally save pleadings and printed copies of pleadings .2 (partially charged) save invoices for services in Illinois .1 (no charge) e-mails with attorney Wagner to replace Dicastal North America, Inc in place and stead of CITIC Dicastal Co, Ltd .1 Prepare initial draft of administrative motion re Dicastal .3 E-mails re scheduling meet and confer .1 E-mail to attorneys Webber and Nemeth .1 Organize to file proofs of service on Eisenmann entities in Delaware and in Illinois .3 Direct save and organization of proofs of service, discuss organization of service information and preparing spreadsheet .2 Research BMW corporate entities, Prepare revised administrative motion for BMW, e-mail to attorney Colin West .3		
4/27/2018 Receive and review invoice from Elite Process Serving	400.00/hr	40.00
Printed and Filed Pleadings	75.00/hr	337.50
4.5		
discuss with staff organization of paper copies of pleadings .1 Prepare administrative motions to substitute true name for Dicastal and for BMW, prepare proposed Orders, e-mails to counsel .6 E-mail from attorney West .1 E-mails with attorney Bernay .2 Receive and save e-notices of and filed proofs of service on German Eisenmann entities .2 Internet investigation re injured Tesla workers .2	400.00/hr	560.00
4/28/2018 research re trafficking, save research, save articles .5 Conduct investigation and save information re Volvo use of workers and plant construction ongoing .2	400.00/hr	680.00

Gregor Lesnik

Page 80

	<u>Rate</u>	<u>Amount</u>
Prepare drafts of requests to produce 1.0		
4/29/2018 add to draft Joint CMC Statement .5 E-mail from attorney Wagner, revise administrative motion re Dicastal, complete to file motion and Order .3 review Standing Order re case management, prepare notes for meet and confer .3 E-mail to counsel re model protective order .1	400.00/hr	480.00
4/30/2018 Worked on spreadsheet , download efiled proofs of service, recorded, who, when, where, and filing dates. 5.0	75.00/hr	525.00
Assembled efiled Motions and personally delivered to District Court 2.0		
calls to contact West for BMW and Wagner for Dicastal re amending SAC for US entity(ies) instead of foreign entity(ies), save memos to file 1.0 Receive returned attempted service in San Pedro for California Vuzem entity .1 e-mail to We-Kr about response due to SAC .1 Research California and research South Carolina service on dissolved or inactive corporate entities; Prepare administrative motion and complete and e-file mtns re service of US Vuzem entities - California and South Carolina, along with proposed orders 1.7 E-mail to Judge Koh attaching proposed Order regarding substitution of DiCastal entity .1 E-mail to Judge Koh attaching proposed Order regarding service on California Vuzem entity .1 E-mail to Judge Koh attaching proposed Order regarding service on South Carolina Vuzem entity .1 Prepare certificates of service of response to motions to dismiss .3 Review service spreadsheet .2 Evaluate application to amend as to Magna .1 evaluate whether to Dismiss Keystone and to Dismiss Phoenix Mechanical .1 memo re arranging svs on Polish entities .1	400.00/hr	1,720.00

Gregor Lesnik

Page 81

	<u>Rate</u>	<u>Amount</u>
Discuss obtaining Danijel assistance to have Vuzems personally served .1 Save to word, and revise draft Joint CMC Statement .2		
5/1/2018 Worked on spreadsheet , download efiled proofs of service, recorded, who, when, where, and filing dates. 7.0	75.00/hr	525.00
Worked on spreadsheet , download efiled proofs of service, recorded, who, when, where, and filing dates. 7.0	75.00/hr	525.00
discuss with staff and direct save of filed Proofs of service, review save and printed copies .2 Direct save and organization and office filing of proofs of service and returns served and unserved for Daimler, Eisenmann German entities and Eisenmann Corporation, Rehau, ISM Vuzem USA, Mercedes Benz, Keystone, LAX, VW, Tesla, Deere & Co, Volvo, Dicastal, VW Waiver, We-Kr, VV Mont, Gregurec, Mos Servic, HRD-Mont, corrected Mos Servis, corrected HRD-Mont .2 (partially charged) make searchable proofs of service on Eisenmann entities, refused and mail services on Vuzem entities and individual .2	400.00/hr	240.00
5/2/2018 discuss with staff spreadsheet of co-workers .1 Locate and save social mediat posts for officers and employees of Rimsa .1 Complete administrative motion to substitute BMW entities, save in word and pdf, prepare proposed order, e-mails to and from attorney Colin West, e-file, e-mail to Judge Koh; receive e-filing confirmation, save and print notice, administrative motion and proposed Order .5 Receive reply by Tesla, save, review, print .3 Receive reply by Deere, save, review, print .3 Receive reply by Eisenmann, receive objections to Request for Judicial Notice, save, review, print .7 Receive reply by LAX, receive Joinder in Eisenmann reply, save, review, print .2 Receive reply by Rehau and MBZ, save, review, print .3 Prepare revised draft Joint CMC Statement .2 E-mail from attorney Bernay .1 Meet and confer call with defendants counsel who did attend, evaluate what	400.00/hr	1,360.00

Gregor Lesnik

Page 82

	<u>Rate</u>	<u>Amount</u>
was discussed and issues, memo to file .6		
5/2/2018 Complete calls with clients about initial CMC issues 1.0	400.00/hr	400.00
5/3/2018 Organized and Filed Docs .25	75.00/hr	18.75
e-mail from counsel; Receive revised draft Joint CMC Statement and proposed Order, revise, e-mails with counsel .3	400.00/hr	2,280.00
Research regarding stay of proceedings, memo to file .6		
Research FCA current issues, save articles 1.0		
Further research and update memo re stay of discovery .3		
Research 9th Circuit rule 9 motions to dismiss standards, memo to file .5		
Research re, review prior research re, and prepare memo re failure to pay supports FCA claims .3		
Prepare initial draft MPA in opposition to motion to stay discovery .3		
Call to ecf court clerk re e-filing issues .1 (no charge)		
save to file waiver by Gregurec .1		
Research 9th Circuit analysis of service abroad, save decisions, prepare memo 1.0		
Locate 9th Circuit authorities for service on subsidiaries, locate California authorities, memos to file .5		
E-mail to attorney Bernay citing authority for service on Eisenmann entities .1		
Begin draft MPA in opposition to VW motion to dismiss .6		
E-mail from Bernay .1		
prepare for and attend Rule 26(f) conference with counsel by conference call, memo to file 1.5	400.00/hr	1,000.00
meeting with Danijel Travancic re svcs on Vuzems individually 1.0		

Gregor Lesnik

Page 83

	<u>Rate</u>	<u>Amount</u>
5/4/2018 locate internet information for BMW US and International entities, download and save articles, statements of officers, annual report, review for information about relevant projects 1.0	400.00/hr	400.00
5/5/2018 discussion with attorney Eskin, e-mail from Eskin .1	400.00/hr	40.00
5/6/2018 memo of questions for client re Gregurec, Deere and information from co-workers witnesses .2 Prepare draft MPA in opposition to VW motion to dismiss .4 Extract facts for opposition to VW motion .1 Internet investigation for construction sites for Deere & Co .2 Conduct research re mandatory workers compensation coverage in other states, save articles, memo to file .3 Research FCA authorities, save cited decisions .3 Complete MPA in opposition to VW motion 1.0 Complete to e-file, e-file, receive notification of e-filing, save, print .1 (partially charged save e-notice of filing proofs of service, download, save and print filed proofs of services and waiver of service .2 Phone call and e-mail with attorney Eskin of Levin Simes .3	400.00/hr	1,240.00
5/8/2018 receive e-notice and filed request to appear by phone, Orders advancing hearing dates, download, save and print .2 Calendar revised hearing date .1	400.00/hr	120.00
5/9/2018 download and save further POS .1 Add to draft Rule 26 Disclosure of witnesses and contact information 1.0	400.00/hr	440.00
5/10/2018 receive e-notice of withdrawal of ADR notice of non-compliance .1 Prepare caption for further pleadings .1	400.00/hr	80.00
5/11/2018 review all internet and social media documents, prepare list of other potential defendants / involved labor contractors and hiring companies 1.5 E-mails with counsel, review and revise proposed Joint CMC Statement	400.00/hr	800.00

Gregor Lesnik

Page 84

	<u>Rate</u>	<u>Amount</u>
.3 E-mail to clients re draft CMC Statement		
.1 E-mails with consultant Palmer, and with attorneys Holton and Fuller		
.1		
5/12/2018 obtain articles and corporate status for Deere & Company, save		320.00
.1 obtain articles and corporate status for Mercedes-Benz U.S. International, Inc. and Alabama tax report regarding same, save	400.00/hr	
.2 obtain articles and corporate status for Rehau, Inc., save		
.1 obtain articles and corporate status for LaX Fabricating, Ltd., obtain Minnesota job creating documents, save		
.12 obtain articles and corporate status for Volkswagen Group, save		
.1 E-mail to counsel re changes in proposed CMC Statement		
.1		
5/14/2018 locate, review, and save ESI Guidelines, Standing Orders, model stipu for e-discovery	400.00/hr	1,360.00
.1 Research authorities re jurisdiction in United States		
.1 Prepare checklist for proofs of service		
.2 Call and e-mail with attorney Grbeshi re visa issues		
.2 Receive, save and review VW reply MPA, and VW opposition to Request for Judicial Notice		
.1 Update caption		
.1 Add to draft of requests to produce to all parties		
1.5 Prepare request to produce to Eisenmann Corporation		
1.0 E-mail with atty Lee for VW		
.1		
5/15/2018 Check all Pleadings for Dismissals and prepared Request for Production of Documents to Eisenmann Corp, Tesla, Volkswagen Group, Lax Fabricating, Deere & Co., Rehau, and Mercedes Benz	75.00/hr	300.00
3.0 Prepared check off list and prepared Proof of Service Shell		
1.0		

Gregor Lesnik

Page 85

	<u>Rate</u>	<u>Amount</u>
5/15/2018 update list of potential defendants		1,160.00
.4	400.00/hr	
Receive Order allowing appearance by phone		
.1		
Research German corporate law, save article		
.2		
Locate internet information for Eisenmann board members, save		
.1		
Locate and save Eisenmann press releases		
.2		
Revise and complete to serve requests to produce to Eisenmann		
.2		
Prepare shells for requests to produce to MBZ, Rehau, Deer, LaX, Tesla, and VW, cross-reference and proof		
.6		
Research German corporate entities and form of naming as LLC, Ltd Pp, Pp, and Corporation		
.2		
Receive Order allowing appearance by phone, save		
.1		
Receive order allowing service on ISM Vuzem, USA, Inc.		
.1		
Receive order allowing service on Vuzem, USA, Inc.		
.1		
Prepare to serve pursuant to Order ISM Vuzem USA, Inc., scan envelope and certified mail		
.1		
E-mails to clients regarding status and regarding translations		
.1		
Prepare, execute and file Certificate of Interested Parties		
.2		
Prepare draft proof of service by mail		
.2		
research re discovery, injured workers, amendment of complaint		1,200.00
3.0	400.00/hr	
5/16/2018 prepared pos and served 12 defendants discovery		150.00
2	75.00/hr	
Receive and review revised defendant proposals for Joint CMC Statement; create inserts, revise, e-mail to counsel		720.00
.2	400.00/hr	
Review and revise CMC Statement, e-mails with counsel		
.1		
Social media and internet research re Eisenmann entities		
.2		
Research Volvo Cars entities		
.1		
Social media and internet research re Eisenmann employees and HR including cross-referenced to other entities, save print screens		
.3		

Gregor Lesnik

Page 86

	<u>Rate</u>	<u>Amount</u>
Receive e-mails, save photos of Tesla construction work ongoing .1		
Receive e-filed Joint CMC Statement, save, print .1		
Review workers spreadsheet, prepare spreadsheet for FOIA request .5		
Add to draft rule 26 disclosure .1		
E-mails with counsel .1		
5/17/2018 finalizing Rule 26 Disclosures		450.00
3.0	75.00/hr	
Convert documents to PDF, move to appropriate folders and organize files on server. 3.0		
discuss and review updated service spreadsheet .1 (partially charged)	400.00/hr	1,720.00
download and save additional photos of work at Tesla under unsafe conditions .2		
Locate and save documents for attachments to Rule 26 Disclosure .1		
Save information for workers comp defense attorneys re settlement issues .1		
Save social media, secretary of state, and internet articles, postings and other documents re Eisenmann, Volvo, and other entities 1.0		
Locate and save information regarding death of Slovenian worker Bojan Sprah at BMW in South Carolina .2		
Receive and save copies of security cards for Papes .1		
Locate and save internet postings for Greiner, CBSN, MDM employee complaints, Gregurec NAICS code, DPT management, Gregurec office, Gregurec corporate status, Gregurec Alabama entity, relationship of supervisors who worked at both Eisenmann and MBZ and BMW, Guardian Glass construction including in Carleton 2.0		
Update proof of service .1		
E-mail to clients draft of Rule 26 disclosure of witnesses .1		
E-mail to clients Joint CMC Statement .1		
Receive and save Rule 26 Disclosures by Eisenmann, and by Rehau .2		
5/18/2018 Locate and save internet including social media postings and secretary of state information for Eisenmann, Kovacic, BMW, IWG, Reschka, LIB, MP Ptuj, Cain Group, Helena Ogrizek, Magna, HRID-Mont, d.o.o.	400.00/hr	1,240.00

Gregor Lesnik

Page 87

		<u>Rate</u>	<u>Amount</u>
	3.0 E-mails with clients re Helena Ogrizek of HRID-Mont, d.o.o. .1		
5/19/2018	e-mail from Papes that Ogrizek is wife of Robert Vuzem .1	400.00/hr	40.00
5/20/2018	save into formats to convert to pdf numerous documents and files; locate and save additional documents from internet re corporations and employees; organize documents into categories and by defendants for Rule 26 production 6.0 E-mail to and from attorney Lee re meet and confer scheduling .1	400.00/hr	2,440.00
5/21/2018	Receive and review Volkswagen Group of America Chattanooga Operations, LLC Initial Disclosures Deere & Companys Rule 26 Initial Disclosures	400.00/hr	40.00
	Receive and review Summons and Complaint that we sent Certified Return Receipt to ISM Vuzem in South Carolina was returned with note saying Return to Sender. Unable to Forward	400.00/hr	40.00
	downloaded Intitial Rule 26 Disclosure to USB drives, mailed out drives to 6 of the 13 defendants and letters to all 13 defendants 1.0	75.00/hr	75.00
	save into formats to convert to pdf numerous documents and files; organize documents into issues and parties for completion of 11,845 pages of bates stamped documents for Rule 26 production 4.5 Prepare letter to counsel to enclose production .1 E-mail from Stjepan re court appearance in Ptuj, Slovenia with attorney Marijan Aleksic .1	400.00/hr	1,880.00
5/22/2018	e-mails with clients re Katarina as wife of Ivan Vuzem .1 Save ISM Vuzem d.o.o. company information .1 Research limited access to Slovenian court records .1	400.00/hr	120.00
5/23/2018	Prepare Proof of Service, Organize and serve discovery request for 13 defendants 3.	75.00/hr	225.00
	complete to serve: First Set of Interrogatories to Defendant Eisenmann Corporation; First Set of Requests to Produce and First Set of Interrogatories to Defendant Tesla Inc.; First Set of Requests to Produce and First Set of Interrogatories to Defendant	400.00/hr	3,040.00

Gregor Lesnik

Page 88

	<u>Rate</u>	<u>Amount</u>
Mercedes-Benz U.S. International, Inc.;		
First Set of Requests to Produce and First Set of Interrogatories to Defendant		
Volkswagen Group of America Chattanooga Operations, LLC.;		
First Set of Requests to Produce and First Set of Interrogatories to Defendant		
Deere & Company;		
First Set of Requests to Produce and First Set of Interrogatories to Defendant		
Lax Fabricating Ltd., and		
First Set of Requests to Produce and First Set of Interrogatories to Defendant		
REHAU, Inc.		
4.5		
Conduct research re jurisdiction, visa statutes, obtaining visa by false		
statement, plain meaning, failures to pay, changes from pre-FERA statute,		
overpayments		
.8		
Read and save articles re FCA claims		
.3		
Locate and save social media posts of other workers, including for Rimsa		
.3		
E-mail from Stjepan with memo re injuries to other workers		
.1		
Receive MBZ request to appear by phone		
.1		
E-mail from Tomislav Bedekovic of We-Kr attaching visas and salary lists re		
B1 visas; download and save attachments		
.1		
E-mails with Travancic re service		
.1		
Research re service by Hague in Germany		
.3		
Memo re supplements to Rule 26 Disclosure		
1.		
5/24/2018 Gather all emails and Proofs of Service relating to Service on Ivan and		300.00
Robert Vuzem, determine the steps taken for service and prepare	75.00/hr	
Certificates of Service on each		
4.0		
schedule travel; save proposed itinerary		480.00
.2 (no charge)	400.00/hr	
e-mail to clients re travel to Zagreb and interviews of witnesses		
.1		
Save to pdf initial Plaintiffs disclosures		
.1		
Add bookmarks for copy of Rule 26 production		
.1 (partially charged)		
Research class certification for RICO claims under 9th Circuit analysis		
.2		
Discuss with staff spreadsheet for service		
.1		
E-mail to Webber and Nemeth re initial CMC and motion to sever		
.1		
E-mails to and from clients re travel and case status		

Gregor Lesnik

Page 89

	<u>Rate</u>	<u>Amount</u>
.1 Receive Order granting appearance by phone		
.1 Receive e-mail and proof of service on Ivan Vuzem and on Robert Vuzem		
.1 Receive additional applications for counsel to appear by phone		
.1		
5/24/2018 call with Stjepan Papes		80.00
.2	400.00/hr	
5/27/2018 prepare updated summary of state laws regarding wages claims		280.00
.7	400.00/hr	
5/29/2018 Gather and organize all Certificate of services		22.50
.5	45.00/hr	
Prepared draft Administrative Motions to Replace Defendants HRID-Mont, Magma International and Magma doo		45.00
1.	45.00/hr	
Cross-reference filings		45.00
1.	45.00/hr	
Gather and organize all Certificate of services		37.50
.5	75.00/hr	
Prepared draft Administrative Motions to Replace Defendants HRID-Mont, Magma International and Magma doo		75.00
1.	75.00/hr	
Cross-reference filings		75.00
1.	75.00/hr	
e-mail from Nemeth re differing analysis of measure of damages under wages claims and under RICO		640.00
.1	400.00/hr	
Save docket		
.1		
Research relation back in diversity jurisdiction under California law and under federal procedure		
.3		
Prepare administrative motions to substitute true name of Magna entity, HRID-Mont; prepare proposed Orders, e-file, receive confirmation of filing, save, print, prepare e-mails to Judge Koh		
1.0		
Attempted call to Bedekovic of We-Kr, e-mail to Bedekovic		
.1		

Gregor Lesnik

Page 90

	<u>Rate</u>	<u>Amount</u>
5/30/2018 Gathered and downloaded documents pertaining to Motion to Sever, Opposition, Replies, Declarations, and opened new Motion to Sever folder. 2.0	45.00/hr	90.00
Organizing documents 1.0	45.00/hr	45.00
Prepared Certificate of Service on D2N Tehnologije d.o.o. aka D2N d.o.o. .3	45.00/hr	13.50
prepare to file POS Ivan Vuzem .1	400.00/hr	3,240.00
Save SAC translated into Croatian (dated 3/5/2018) .1		
Save SAC translated into Slovenia (dated 3/26/2018) .1		
Save Slovenian - Croatian - English combined SAC (dated 3/26/2018) .1		
Prepare POS for attempted service on Robert Vuzem and on Ivan Vuzem .4		
Locate and save further information and social media posts for We-Kr employees .2		
prepare for CMC, prepare memo of issues for discussion 2.0		
Conference with attorney Chuck Lee for VW 1.0		
Travel to and attend CMC, organize notes from CMC 3.0		
Prepare proposed POS for D2N .2		
Receive e-filed POS for Ivan Vuzem .1		
Receive minute Order, receive CMC Order, save, print, calendar .1		
E-mail to Webber and Nemeth re CMC .1		
E-mail from Webber .1		
Call with Nimish R Desai of Lieff Cabraser Heimann & Bernstein, LLP .1		
Call with Sylvia at Phillips & Cohen re potential retention and conflicts check .1		
E-mail to Lingua-Soft .1		
Call with Tomislav Vedokovic of We-Kr .2		
review binders of pleadings for motions 2.0	400.00/hr	2,960.00
call with Papes, prepare for and call with Tomislav of We-Kr, save memo 1.0		

Gregor Lesnik

Page 91

		<u>Rate</u>	<u>Amount</u>
	Travel to and attend lunch with Chuck Lee, counsel for VW 1.4 Prepare for, travel to, and attend initial CMC, including argument on other motions and matters decided by Judge Koh 3.0		
5/31/2018	Receive and review Notice from Department of Financial institutions Certifying that Lax Fabricating, Ltd. has filed Articles of Organization on August 31, 2007 and other charter documents	400.00/hr	40.00
	31 Locate and save about 20 DOJ press releases relevant to visa and FCA issues in this case, save; review same 1.0	400.00/hr	400.00
6/1/2018	review in detail CBSN internet articles, e-mail from Palmer, save screenshots, locate and save social media postings of workers 2.0 Save prior e-mails with attorney Michael Hancock, and with Emily Rand, re viability of and facts of claims .1 Save prior e-mails with Proctor of US Attorneys Office .1 E-mails with Palmer .1	400.00/hr	920.00
6/4/2018	cross reference filed docs .5	45.00/hr	22.50
	locate and save articles and postings re death of Bojan Sprah .2 Locate and save articles and photos of Robert Vuzem .2 Locate and save BMW postings, minutes and news releases .2 Research information from Spartanburg County, and from South Carolina .3 Information re Hague Convention .1 Locate social media posts and save same re other company workers in US .2 Research re releases of FCA claims as void absent consent, memo to file .2 Save prior research re service of process under Civil Procedure Act of Slovenia, chapter 11 .1	400.00/hr	600.00
6/5/2018	save corporate information re potential additional defendants .1 Memo to file re potential additional defendants by name, address and corporate status .4	400.00/hr	400.00

Gregor Lesnik

Page 92

		<u>Rate</u>	<u>Amount</u>
	Call with Sylvia at Cohen Milstein re complexity of issues militates against their participating; discuss her analysis .3 Locate and save DOJ press release re Sistemas Globales S.A.; review same .2		
6/6/2018	E-mail from Papes re Slovenia police in Velenje call to Gregor to give statement re claim by ISM Vuzem, save images of statement; call to Gregor, call to Papes, call to Danijel .5 E-mail to Gregor re status of pleadings and viability of claims against Vuzem .2 Research qui tam releases, save article .2 Research TAF, review articles, call to Taxpayers Against Fraud, save memo .3 Locate congressional and senate representatives for immigration issues, memo to file .1 Discuss with staff updated employee spreadsheet .1	400.00/hr	480.00
6/7/2018	Employee/witness list 5.0 prepare FOIA request to USCIS with attachment of spreadsheet .3 prepare FOIA request to USAG, ND Texas with attachment of spreadsheet .3 E-mail, save print screen shot of spreadsheet of workers by companies and locations .2 Receive e-order for transcript .1 Prepare transcript order, e-file .1 E-mails with court reporter Shortridge .1	75.00/hr 400.00/hr	375.00 440.00
6/8/2018	Save information re LaX .1 Prepare draft second sets of requests to produce based on assertions in motions to dismiss 1.5	400.00/hr	640.00
6/10/2018	e-mail from Travancic .1 Receive returned attempted service on ISM Vuzem, USA .1 Save mp4 video and save photos of ISM Vuzem at times of attempted service .2	400.00/hr	160.00

Gregor Lesnik

Page 93

	<u>Rate</u>	<u>Amount</u>
6/10/2018 Mtg with Danijel Travancic, calls to Stjepan Papes, Gregor Lesnik and Nenad Modic 1.4	400.00/hr	560.00
6/11/2018 Receive and review Record of Service of Process on Deputy Secretary of State and forwarded to Vuzem on May 16, 2018	400.00/hr	40.00
Scanned Proofs of Service, saved to server, and made searchable, efiled with the court .4	45.00/hr	18.00
save services on Eisenmann entities .1	400.00/hr	480.00
Locate index of BIA precedent decisions, save .1		
Identify relevant decisions, memo to file .2		
Call Patten with TAF, memo to file .1		
Research alternative petition based visas, save memos re immigration regs, save individual regs .4		
Research David v Signal trial and appellate status on claims other than trafficking .2		
E-file POS on Eisenmann German entities in Illinois .1		
call Robert Patten at taxpayers against fraud .3	400.00/hr	160.00
review presenter outlines for Northern California CAOC Class Action and Mass Torts Seminar .1		
6/12/2018 Prepared POS cover on Robert Vuzem, efiled .4	45.00/hr	18.00
Efiled Eisenmann Anlag POS .2	45.00/hr	9.00
memo to staff re: filing POS and orders from court .1	400.00/hr	40.00
6/13/2018 add information to witness list, typed memos of wcd notes 2.	45.00/hr	90.00
Sort and organize documents to be entered in system 1.0	45.00/hr	45.00
e-mail to clients re change in travel plans .1	400.00/hr	40.00

Gregor Lesnik

Page 94

	<u>Rate</u>	<u>Amount</u>
6/13/2018 review notes re Papes v Vuzem trial in Ptuj, Slovenia, represented by lawyer Marijan Aleksic .1	400.00/hr	40.00
6/14/2018 research re Magna International .2	400.00/hr	80.00
6/18/2018 Translate forms 1.5	45.00/hr	67.50
6/19/2018 Receive and review Defendant Tesla, Inc.s Initial Disclosures	75.00/hr	7.50
receive response to FOIA including applications, permits and plan review documents from City of Greer re: Minghua, save, skim review .2 Research VW build out press releases and articles, save .2 Research US v VW criminal information .2 E-mail from and to attorney Lee regarding documents related to VW .1 Receive and save reporters transcript, review same .1 Receive Order denying motion to sever .1 E-mail to Webber and Nemeth .1 Review documents saved by office including: e POS on Robert Vuzem certificate of service on BMW USA certificate of service on Dicastal Orders to substitute true name of Magna and HRID-Mont entities Updated service spreadsheet .2	400.00/hr	480.00
6/20/2018 Prepared access info form in English .4	45.00/hr	18.00
e-mail from attorney Webber .1 Request for account information to court in Croatia re Krunoslav Premusic prosecution for trafficking .1	400.00/hr	80.00
6/21/2018 direct staff to save memos of calls with witnesses .1 E-mail from USCIS confirming receipt of FOIA and directing request to DOJ .1 E-mail to USCIS .1 Review e-mail from Papes and attached Croatian court document re tax	400.00/hr	160.00

Gregor Lesnik

Page 95

	<u>Rate</u>	<u>Amount</u>
dispute with Vuzem .1		
6/22/2018 call and leave message with Christine Webber .1	400.00/hr	40.00
6/23/2018 e-mail to Christine Webber re representation .1	400.00/hr	40.00
6/25/2018 download and save prior E-notice of transcript .1 Review e-mail from Webber .1	400.00/hr	80.00
6/26/2018 e-mail from and call with attorney Bifoss requesting additional motion beyond consolidated motion directed by Court .1	400.00/hr	40.00
left vm for Christine Webber re representation .1 (no charge)	400.00/hr	NO CHARGE
6/27/2018 Worked on Witness list 2.0	45.00/hr	90.00
<div style="background-color: black; height: 30px; width: 100%;"></div>		80.00
revise calendar re already issued order at CMC on motion to sever .1	400.00/hr	40.00
6/28/2018 Worked on spreadsheet 4.0	45.00/hr	180.00
receive LaX application to file additional motion, proposed Order, Declaration of Bifoss; evaluate same .2 Conduct research of defense analysis of jurisdictional discovery, save article, locate and save orders granting and denying jurisdictional discovery; prepare memo re alternate standards and remedies; save Bristol Myers and related cases holdings .4 Prepare draft of MPA re jurisdictional discovery .3 Research re nationwide jurisdiction for RICO claims .1 Research nationwide jurisdiction for FCA claims .1 Add to admin motion to substitute Mos entity, prepare admin motion to substitute LB Metal entity .3	400.00/hr	560.00

Gregor Lesnik

Page 96

	<u>Rate</u>	<u>Amount</u>
6/29/2018 e-mail to clients re status, and re issues for anticipated joint motions to dismiss, and request for information .4 E-mail from USCIS .1 Review prior e-mail from Spartanburg County; prepare letter re FOIA request .3 Locate information for LCA and LC applications, save .2 Prepare FOIA request to DOJ, e-mail to DOJ .2	400.00/hr	480.00
call with Stjepan Papes .2	400.00/hr	80.00
6/30/2018 call with Stjepan Papes 1.0	400.00/hr	400.00
7/2/2018 worked on B1 Worker spreadsheet 6.0	45.00/hr	270.00
memo re Vuzem family .1 Research DOJ denials of visas .2 Prepare FOIA to DOJ Re Modugumudi, e-mail to DOJ .3 Update worker spreadsheet .2 E-mail from Spartanburg, letter and e-mail to Spartanburg .2	400.00/hr	400.00
7/3/2018 organize file. .2	45.00/hr	9.00
receive and save Tesla disclosures .1	400.00/hr	40.00
7/5/2018 worked on B1 Worker spreadsheet 4.0	45.00/hr	180.00
Scanned, made searchable, and saved to server then efiled VUZEM USA INC. POS .3	45.00/hr	13.50
save add ons to rule 26 disclosures .1 Prepare to file POS on Vuzem USA, Inc. (California) .1	400.00/hr	80.00

Gregor Lesnik

Page 97

	<u>Rate</u>	<u>Amount</u>
7/12/2018 assist in research at Law Library .5	75.00/hr	37.50
Add to Workers Spreadsheet .4	75.00/hr	30.00
research fee schedule, save FR re same .2	400.00/hr	2,440.00
Research INA statutes and regs re payment of fees as compared to arguments about penalties, locate citations, prepare memo for insert to opposition to motions .6		
Locate and save visa CFRs; sort regs including 1987 rules reorganization into parts 40 and parts 41 and 42; locate 2018 consolidated appropriates bill including prior and subsequent portions relevant to visa fees; review and analyze same 2.0		
Research joint employment under 29 CFR 791.2 .2		
Research wages and related claims under DLSE and private causes of action; pleadings standard on motion to dismiss .2		
Research re trafficking claims and causes of action .2		
Review regs re T1 immigration visas .3		
Locate cited decisions in prior motions to dismiss re visas arguments, save, review, and analyze 1.5		
Read and save memo from Papes re other injured workers .1		
Add authorities and analysis on draft opposition to motion for stay .2		
Update list of potential similar Labor Contractor and Manufacturer defendants .1		
Research statutory basis for visa regs .1		
Locate and save cited authorities in prior motion to dismiss re FCA .3		
Receive application to appear pro hac vice .1		
Locate weather information and prepare memo re South Carolina blizzard in February of 2014 .1	400.00/hr	1,160.00
Continue to locate and save prior cited authorities for later review .5		
Memo re joint employer coverage under 29 CFR 825.106 .1		
Receive notice of appearance for BMW .1		
Receive Order denying LaX request for separate motion to dismiss		

Gregor Lesnik

Page 98

	<u>Rate</u>	<u>Amount</u>
.1 Save filed POS		
.1 Receive applications to appear pro hac vice		
.1 E-mail from and letter to Spartanburg County		
.3 Prepare Administrative Motion and proposed Order to substitute LB Metal, e-file		
.3 Investigate Mos Service entity in Tennessee		
.1 Prepare Administrative Motion and proposed Order to substitute Mos Servis, d.o.o., e-file		
.3 Receive late evening filed joint motion to dismiss, declarations, motions to file under seal, exhibits, proposed order, sealed motion to dismiss, and e-mails, download and save		
.5 E-mail to clients		
.1 E-mail to Judge Koh attaching proposed orders		
.1 E-mail to translator Bojic to translate orders to amend pleadings		
.1		
7/13/2018 e-mail to consultant Palmer		80.00
.1	400.00/hr	
E-mail from attorney Nemeth		
.1		
7/14/2018 e-mail from Stjepan, save attachments		80.00
.2	400.00/hr	
7/15/2018 e-mail from Bojic re translations		40.00
.1	400.00/hr	
7/16/2018 Law library downloading cases that were listed in the moving documents of defendants. Looked up on lexis the cites that were missing. Time: 3.25		146.25
	45.00/hr	
Translate emails		75.00
1.	75.00/hr	
Review service of defendants		37.50
.5	75.00/hr	
Personally deliver docs to District Court		22.50
.5	45.00/hr	

Gregor Lesnik

Page 99

	<u>Rate</u>	<u>Amount</u>
7/16/2018 Update spreadsheets		75.00
1.	75.00/hr	
review Papes memo of response to questions about workers, google translate portions in Croatian, save	400.00/hr	2,600.00
.2		
prepare memo of additional workers		
.1		
Direct updates to B1 worker spreadsheet		
.1		
Research analysis of proportionality limits and objections to discovery		
.2		
Direct saving tracking by USPS of mailing to ISM Vuzem, d.o.o.		
.1		
Locate, save and begin to review about 70 cited decisions		
5.5		
Locate lexis cited for westlaw cited cases		
.3		
7/17/2018 locate MDM Polska website and officers, save		480.00
.2	400.00/hr	
Research Instructions for H-2B visas and regulations		
.4		
Research enforcement obligations under CFR		
.2		
Call with attorney Webber, memo to file		
.2		
E-mail to Webber and Nemeth		
.1		
Discuss Updated worker spreadsheet		
.1		
7/18/2018 Update B1 Spreadsheet and Update Service Spreadsheet		300.00
4.0	75.00/hr	
Prepared Certificate of Service on ISM Vuzem USA, Inc. with exhibits		22.50
.3	75.00/hr	
Receive and review Initial Disclosures of BMW		40.00
	400.00/hr	
Conduct research for Primiko, d.o.o.		200.00
.2	400.00/hr	
Locate and extract building inspections for 1000 Robinson Road		
.2		
E-mail from and to Greer South Carolina re receipt of zip drive		
.1		

Gregor Lesnik

Page 100

	<u>Rate</u>	<u>Amount</u>
7/19/2018 looking up codes from US and AL and CA and rules/Regulations from Def Moving Papers pleadings and saving in PDF form	45.00/hr	112.50
Total time: 2.5		
Receive and review letter from US Department of Justice re Freedom of Information Act and FOJA	45.00/hr	4.50
Cross check B1 Workers and make corrections	45.00/hr	225.00
5.		
review regs, continue to review cited authorities	400.00/hr	2,600.00
.3		
Prepare memo to insert regarding Labor Certification		
.3		
Review authorities re jurisdiction		
.5		
Prepare memo re prima facie showing for jurisdiction, and alternative standards for discovery re same		
.1		
Prepare memo to insert regarding jurisdiction for claims under section 3730		
.2		
Prepare memo to insert regarding visa regulations		
.2		
Discuss with staff work spreadsheets		
.1 (no charge)		
locate, save and extract individual citations to 18 USC, 31 USC, 8 USC, Alabama Code, California Civil Code, Labor Code and Penal Code, CFR, and FRCP		
4.5		
Prepare insert regarding visas		
.3		
E-mail to Emily Rand of CBS		
.1		
7/20/2018 Saving the legal authorities cases into searchable PDF, Combining all legal authorities into 1 PDF, creating index for Legal Auth, indication which cases had received negative treatment and why	45.00/hr	135.00
Time: 3		
further research re H-2B Temporary Non-Agricultural Workers visas, regulatory framework, and petition based visa fees	400.00/hr	680.00
1.0		
Save 81 cited authorities to pdf for search and analysis		
.5		
Memo re needed decl re hours worked		
.2		
7/22/2018 prepare draft MPA in opposition to Eisenmann administrative motion	400.00/hr	480.00
1.2		

Gregor Lesnik

Page 101

	<u>Rate</u>	<u>Amount</u>
7/23/2018 revise and complete to file Opposition to Eisenmann Administrative Motion to File Under Seal	400.00/hr	1,280.00
.3 direct exhibit cover pages for certifications of service		
.1 Memo to insert regarding completeness of recording for settlement documents		
.2 Research 9th Circuit decisions re trafficking, save compendium of authorities, review and analyze relevant authorities		
1.0 Prepare insert re trafficking		
.4 Prepare insert regarding pleading in complaint for FCA		
1.0 Memo re form for application for entry of defaults		
.2		
7/24/2018 Review file and gather all documents relating to hours	45.00/hr	22.50
.5		
receive response from Executive Office for United States Attorneys regarding FOIA	400.00/hr	120.00
.1 Locate and scan FOIA with signatures; letter to DOJ, e-mail to DOJ		
.2		
7/26/2018 receive and save eOrder for substituting Mos and LB Metal	400.00/hr	40.00
.1		
7/30/2018 locate authorities under Illinois and Delaware law for permitted service, save civil rules	400.00/hr	280.00
.4 Prepare for and call to attorney Bernay re service, memo to file		
.3		
	400.00/hr	280.00
8/1/2018 scanned, made searchable and saved to server, Initial disclosures of Defendant BMW	75.00/hr	15.00
.2		
review BMW initial Rule 26 Disclosure from July	400.00/hr	160.00
.1 E-mails to and from clients re status and additional information		
.2 E-mail from Simon Verbosek of Mos Servis		
.1		

Gregor Lesnik

Page 102

	<u>Rate</u>	<u>Amount</u>
8/3/2018 Receive and review letter from US Department of Justice re Freedom of Information	400.00/hr	40.00
e-mails of Bernay with courtroom deputy		1,040.00
.1 receive German Eisenmann entities motion to quash, along with declarations of Hickman, Salow, Seiler, and proposed Order, save, print, initial review	400.00/hr	
.5 Prepare outline for declarations of Papes and Lesnik regarding jurisdiction arguments		
.4 Prepare draft MPA insert re jurisdiction cribbing from prior research and decisions / orders on similar contentions		
1.6		
8/4/2018 receive, save and review certificates of interested parties for Eisenmann German entities, compare with arguments on motions to quash	400.00/hr	120.00
.2 Receive special appearances for already appearing counsel now appearing for Eisenmann German entities		
.1		
8/5/2018 save form for Petition visas for RJN		1,280.00
.1 Prepare draft declaration of Papes	400.00/hr	
.7 Prepare draft declaration of Lesnik		
.4 Begin to prepare MPA in opposition to Joint MTD		
2.0		
8/6/2018 Updated spreadsheet	75.00/hr	450.00
locate and save firing letter, letter from Vuzem to Gregor,		3,840.00
.2 Locate and save articles re Krunoslav Premusic conviction for trafficking; translate into English to understand	400.00/hr	
.2 Locate and save for exhibits Eisenmann letter to consulate re Lesnik, Lesniks Tesla contractor card, Lesniks Tesla ID badge, Vukadinovic deposition that he is not supervisor and CSR certification		
1.0 Prepare shell of draft Dresser Declaration		
.1 Revise and add to Lesnik declaration		
.5 Revise and add to Papes declaration		
.6 Add inserts and facts to draft MPA in opposition to motion to dismiss		
6.0		

Gregor Lesnik

Page 103

	<u>Rate</u>	<u>Amount</u>
Revise Lesnik declaration, e-mail to Gregor 1.0		
8/7/2018 revise and complete for client review draft declaration of Papes, e-mail to Stjepan, e-mail from Stjepan 1.5 Organize exhibits for Papes declaration .2 Locate, save and organize 600 series of exhibits for RJN re visa fees .3 Prepare draft Request for Judicial Notice that petition based visas have higher fees than non-petition based visas .3 Add to draft MPA in opposition to motion to dismiss, save, further additions, save 2.00	400.00/hr	1,720.00
8/8/2018 locate proofs of service, organize by defendant and location of service, save as proposed exhibit to Eisenmann entities motion to quash service .2 Further research re RICO cause of action, memo to file .5 Further research re conspiracy, memo to file .4 Discuss with staff reviewing disclosures to avoid duplicates, notes re amended disclosure .2 (partially charged) review text of SAC .2 Add to draft MPA in opposition to motions to dismiss 6.0	400.00/hr	3,000.00
8/9/2018 Prepared Draft for Declaration of William C. Dresser in Opposition to Specially Appearing Defendants Eisenmann SE, Eisenmann Anlagenbau Verwaltung GmbH, and Eisenmann Anlagenbau GmbH & Co. KGs Motion to Quash Purported Service of Process.	75.00/hr	300.00
E-mail from Gregor, save scanned signature page .1 Save Papes signature and compile declaration .1 Organize to file declarations of Papes and of Lesnik .1 Complete request for judicial notice, save cover page for exhibits, prepare to file RJN .3 Complete Dresser declaration in opposition to Joint MTD 1.6 Save exhibits to Dresser declaration, compile to prepare for filing .3 Prepare proof of service; prepare certificate of service .2	400.00/hr	6,720.00

Gregor Lesnik

Page 104

	<u>Rate</u>	<u>Amount</u>
Continue to add to MPA including procedural history, relevant facts, legal arguments, and conclusions and tables (through to hours of 8/10) 14.0 Save for e-filing, file .1		
8/10/2018 save e-filed pleadings, print .1 E-mail to clients .1	400.00/hr	80.00
8/13/2018 Prepared exhibit covers for Declaration of William C. Dresser in Opposition to Specially Appearing Defendants Eisenmann SE, Eisenmann Anlagenbau Verwaltung GmbH, and Eisenmann Anlagenbau GmbH & Co. KGs Motion to Quash Purported Service of Process, scanned, made searchable and saved to server. 4.0	75.00/hr	300.00
Receive and review letter from letter from attorney Gregory Roberts re filing an Amended Petition and Declaration of Readiness to Proceed under separate cover, Compex records request forms. Records Request from Compex re KLA	400.00/hr	40.00
review service spreadsheet, review filed proofs of service, prepare declaration regarding service on German Eisenmann entitiess 1.5 Prepare declaration re service .1 Prepare to file and file .1 Receive confirmation of efiling Declaration re Eisenmann service .1 Complete RJN including 700 series exhibits re service on Eisenmann entities, prepare to file, e-file, receive confirmation of efiling .3 Locate Delaware statutory authority re service, save memo .1 Complete MPA in Opposition to Eisenmann entities motions to quash, prepare to file, file .8	400.00/hr	1,200.00
8/14/2018 e-mail from attorney Foran regarding claimed confidentiality of filed documents, review productions and source of materials as not being confidential, e-mail to Foran 1.0	400.00/hr	400.00
8/21/2018 Invoice spreadsheet update	75.00/hr	NO CHARGE

Gregor Lesnik

Page 105

	<u>Rate</u>	<u>Amount</u>
8/21/2018 Prepare outline of contentions and issues on motion to dismiss sorted by defendants and moving parties for Eisenmann, Eisenmann entities, Tesla, Daimler, VW, and MBZ, and LaX .4 Discuss with staff service on all entities, direct individual memos for each service .1	400.00/hr	200.00
8/24/2018 e-mail from counsel for Eisenmann re documents filed under seal .1	400.00/hr	40.00
8/25/2018 receive objections to RJN, Reply MPA, certificates of service, objections to further RJN, declaration of Murphy, proposed Order to file under seal, redacted MPA; save, review, print 2.0 Download and save attachments to prior e-mail from Eisenmanns counsel of unredacted documents .1	400.00/hr	840.00
8/26/2018 review internet articles and Tesla statements re motion .1	400.00/hr	40.00
8/27/2018 Receive and review letter from US Department of Justice re Freedom of Information and Privacy Act Request documents associated with Sistemas Globales, S.A. worked on Service spreadsheet	400.00/hr 75.00/hr	40.00 22.50
8/28/2018 Gather service docs and update Service spreadsheet Save entire docket, review; prepare print screens for each document filed under seal .2 Locate documents of public disclosures, save to pdf, save as exhibits for intended declaration .6 Prepare MPA and Declaration in opposition to Eisenmann motion to file under seal, save to pdf to file, e-file 2.8	75.00/hr 400.00/hr	300.00 1,440.00
8/29/2018 Worked on service updates review and save orders for transcripts .1 Discuss with staff checking to confirm we have digital and paper copies saved and filed for all pleadings .1 (partially charged)	75.00/hr 400.00/hr	525.00 80.00

Gregor Lesnik

Page 106

	<u>Rate</u>	<u>Amount</u>
8/30/2018 prepare waivers of service for Magna, LB Metal, discuss international mailing options, direct scan of envelopes, direct mailing .8	400.00/hr	320.00
9/5/2018 Scan, made searchable and saved to server, FOIPA response to request	75.00/hr	15.00
receive response of confidential documents in response to DOJ FOIA .1	400.00/hr	40.00
9/10/2018 receive Order taking under submission motions to dismiss .1	400.00/hr	40.00
9/11/2018 e-mails from and to attorney Bernay re CMC Statement .1	400.00/hr	40.00
9/13/2018 attend ND California seminar re class actions 2.0	400.00/hr	800.00
attend and save memo re applicable issues from ND California, 2018 Civil Law Symposium: Class Actions 3.0 (partially charged) conference with potential co-counsel .2 (no charge)	400.00/hr	1,200.00
9/14/2018 investigate potential class action counsel for wages claims .2 Locate social media posts re HR employees working for multiple defendants .2 E-mails with Monique Olivier .1 E-mails to clients re status of class action issues .1	400.00/hr	240.00
9/16/2018 locate DOJ guidelines for prosecution, save McNulty Memo .2	400.00/hr	80.00
9/17/2018 Call from Johnny of Judicial Process regarding Polish translation for Second Amended Complaint, memo to file .2	45.00/hr	9.00
Receive and review letter from US Department of Justice re Sistemas Globales, S.a./Globant LLC	400.00/hr	40.00
locate DOJ MOU re immigration .2 Locate and calls to organizations concerning worker rights, and organizations re visas .2 (partially charged) e-mail to Dawn Casey .1 calls re Polish translation pending results of Order on motions to dismiss	400.00/hr	280.00

Gregor Lesnik

Page 107

		<u>Rate</u>	<u>Amount</u>
	.1 E-mail from counsel, skim review defense draft of CMC Statement .1		
9/17/2018	contact potential co-counsel Monique Olivier .3	400.00/hr	120.00
9/18/2018	Memo re Process Service in Germany .2	45.00/hr	9.00
	Call from Mr. Bernay, memo to file .1	45.00/hr	4.50
	Research re German Civil Procedure and service .2	400.00/hr	640.00
	Research staffing using H1-B visas .2		
	Begin to prepare inserts for anticipated Third Amended Complaint - visas .2		
	Locate and save Infosys Complaint, settlement agreement, signed off Infosys settlement, docket .3		
	Identify and locate counsel from Infosys case; memos to file, attempted call to prosecuting attorney Griffin .2		
	Call from attorney Bernay .1 (no charge)		
	review draft CMC Statement, prepare memo of detailed revisions and inserts .4		
	E-mails with attorney Murphy re certificates of interested parties for all Eisenmann entities; locate all filed certificates .1		
	calls with Erik Koons, counsel for Magna entities .3	400.00/hr	120.00
9/19/2018	calls with attorneys Koons and Werbel re correct Magna entities; review file notes and articles, memo to file .4	400.00/hr	320.00
	Locate class action claim vs Mercedes and others re emissions, call to attorney Murphy .1		
	Review and revise drafts of CMC Statement, e-mails with counsel .2		
	Receive and save filed CMC Statement, review, print .1		
	e-mails with counsel, review drafts, add to drafts, complete e-mails to allow parties to file Joint Case Management Conference Statement 1.0	400.00/hr	560.00

Gregor Lesnik

Page 108

	<u>Rate</u>	<u>Amount</u>
call with Dawn Casey re immigration and visa issues .4		
9/20/2018 e-mail from Palmer, locate new Infosys complaint, save complaint, locate and save articles .2	400.00/hr	360.00
E-mail from DOJ, review exemptions regs re criminal prosecutions and grand jury re DOJ response to FOIA .2		
E-mails from and to Koons re Magna, service, and applicable entities, and response after pending 12(b) motions .2		
Calls to Kim Friday, USAG, re amendments to complaint, and re discovery, memo to file .2		
E-mails with Palmer and with Dawn Casey including about John Wiano .1		
9/21/2018 review Reuters article re new construction in Alabama .1	400.00/hr	200.00
Save Tesla case reports and articles and blogs by Tesla .2		
E-mail from attorney Steve Williams .1		
E-mail from Baron at SJ Mercury News .1		
call with Jay Palmer .2	400.00/hr	80.00
9/22/2018 call with Stjepan about status .2	400.00/hr	200.00
call with Danijel about status .3		
9/24/2018 receive notice of rescheduled CMC, calendar .1	400.00/hr	40.00
9/25/2018 e-mails with clients re status .1	400.00/hr	640.00
E-mails with attorney Koons re status and affect on response by Magna International entities .1		
Review e-mail from Casey of Protect US Workers, locate cited data, download and save visa data, charts and explanations, review same 1.0		
Research re federal employee depositions .1		
E-mail to Baron .1		
E-mail to Casey .1		

Gregor Lesnik

Page 109

	<u>Rate</u>	<u>Amount</u>
Receive from Papes e-mail and photos of ongoing duct work at Tesla .1		
9/27/2018 Prepared letter to FOIA enclosing signature page for processing .2	75.00/hr	15.00
Prepare revised FOIA request with original blue ink signature for Sistemas Globales information; prepare letter to EOUSA .3	400.00/hr	120.00
9/30/2018 e-mail to Casey re scheduling conversation .1 (no charge)	400.00/hr	NO CHARGE
10/1/2018 call with John Wiano .5	400.00/hr	200.00
10/2/2018 Receive Order denying application to file under seal .1 receive notice of Order, download, save, print and review .3 call with attorney Lee re VW issues .2 Calls with Viking re Poland Service .1	400.00/hr	280.00
10/3/2018 call with attorney Foster re RICO allegations and assistance .1	400.00/hr	40.00
10/4/2018 e-mail to clients re status .1 E-mails with Olivier re status, analysis of Order and revisions to wages causes of action; consideration of associating, agreement on principal terms .3 (partially charged) Forward to clients with explanations, further e-mails from and to clients .1 E-mail and call from, and e-mail to Matija Boltizar of Jutrarnji press .2 Locate, review and extract judges comments from CM Conference on settlement and motions to dismiss .1 Call with attorney Howard Foster .2 Follow up e-mail from Matthew Galin of Foster PC .1 E-mail to John Miano .1	400.00/hr	480.00
10/5/2018 Foster, PC legal services agreement for consultation re RICO causes of action		5,000.00

Gregor Lesnik

Page 110

	<u>Rate</u>	<u>Amount</u>
10/5/2018 locate Vukadinovic testimony .1 E-mails with Alexander Brudar of Slovenska Novice .1 E-mails to and from Galin and Howard .1	400.00/hr	120.00
10/7/2018 e-mail to Palmer .1 Investigation re Volvo developments .2 Prepare draft admin motion to add Volvo Car US Operations, Inc., prepare proposed stipulation .3	400.00/hr	240.00
10/8/2018 Call from opposing counsel Bernay, memo to file .1 Call from Carlos Ramirez, former Tesla representative, memo to file .1 call with Matt Galin and Howard re RICO cause of action .6	75.00/hr 400.00/hr	15.00 240.00
10/9/2018 e-mail from Bernay with draft CMC Statement .1 Review and revise proposed Statement, e-mails to counsel .3 Prepare proposed stipulation re Volvo .1 Receive LaX request to appear by phone, order granting request, save, print .1 Receive Deere request to appear by phone and order .1 E-mail to counsel re adding Volvo .1 call with consulting attorneys Matt Galin and Howard re RICO cause of action .3	400.00/hr	440.00
10/10/2018 many e-mails (9) to and from counsel re revisions to CMC, agree on revised CMC, agree to meet and confer in person; calendar .4 E-mails to clients re status .1 Email to Baron of SJ Mercury News .1 Receive and save filed Joint CMC Statement .1	400.00/hr	280.00
10/13/2018 e-mail from Papes, review attached transfer of employment from ISM Vuzem to HRID-Mont, d.o.o., download and save attachment .1 call with Stjepan Papes	400.00/hr	520.00

Gregor Lesnik

Page 111

		<u>Rate</u>	<u>Amount</u>
	.6 call with wages claims consulting attorney Monique Olivier .6		
10/13/2018	call with Stjepan Papes .6 call with Monique Olivier .6	400.00/hr	480.00
10/14/2018	memo to re-organize, review and revise draft Third Amended Complaint; commence revisions 2.0	400.00/hr	800.00
10/15/2018	research Alabama trafficking statute, analyze application of facts to that statute .3 review and revise draft Third Amended Complaint 5.0 E-mails with Bernay re potential mediation .1 Receive Order rescheduling hearing on motions to quash .1	400.00/hr	2,200.00
10/16/2018	e-mails with Olivier .1 E-mails with Bernay; calendar conference call .1 E-mail from and to Baron .1	400.00/hr	120.00
10/17/2018	E-mail from Ruth Silver Taube re trafficking claims and assistance, directions to Martina Vandenburg .1 Research re Taube, research re Vandenburg .1 E-mail to Taube and Vandenburg .1	400.00/hr	120.00
	contact potential co-counsel .3	400.00/hr	120.00
	confirm recalendar of further CMC .1 (no charge) prepare for and attend conference call re mediation 1.0	400.00/hr	400.00
10/18/2018	Researched cases against Tesla, downloaded documents, Complaints, etc., scanned, enhanced related documents and saved to server 1.0	75.00/hr	75.00

Gregor Lesnik

Page 113

	<u>Rate</u>	<u>Amount</u>
call with Jay Palmer .2		
10/22/2018 US Lesnik Personally deliver documents to Judge Lucy Koh .5	75.00/hr	37.50
e-mail from Vandenberg .1	400.00/hr	1,680.00
grammar, spell and paragraph numbering check; save good draft of Third Amended Complaint, save to pdf 2.5		
E-mail to and from Gallin .1		
call with Stjepan about status .4		
call with consulting attorney Rutger Heymann re proposed mediators .3		
Calls with and e-mails with Olivier re association for class claims depending on evolution of case pleadings and settlement .5		
Many e-mails with counsel for Eisenmann and Tesla about proposed extensions of time, and concern about impact on other party defendants, save e-mails .3		
call with Rutger Heymann re mediators .3	400.00/hr	320.00
call with Monique Olivier re mediators, mediation, and settlement issues for class action claims in mediation .5		
10/23/2018 call from Matt Galin and Howard Foster re assistance on RICO cause of action .2	400.00/hr	80.00
10/24/2018 US Lesnik Organize pleadings .5	75.00/hr	37.50
review contract of transferred employment for construction in US .1	400.00/hr	600.00
Call with counsel re mediation, mediators and their proposed stipulation to extend time to file complaint .5		
e-mail from counsel, review and revised drafts and proposed order, prepare proposed declaration, e-mails with counsel re mediation, other defendants approval of mediation, and stipulations .7		
Multiple e-mails with counsel re proposed mediators and dates for mediation .2		

Gregor Lesnik

Page 114

	<u>Rate</u>	<u>Amount</u>
10/25/2018 US LESNIK		7.50
Call from Pat Foran, memo to file .1	75.00/hr	
e-mails with counsel, review and approve Joint Stipulation, receive notice of e-filing of stipulation, declarations, and proposed Order .2	400.00/hr	160.00
E-mail to and from consulting counsel re stipulation and status .1		
E-mails with consulting counsel re disclosures .1		
10/28/2018 research ethical rules on limitations on practice; save rules and proposed rules .2	400.00/hr	160.00
Research Poland procedures re service .2		
10/29/2018 US LESNIK		67.50
Personally delivered courtesy copy to Judge Koh .4	75.00/hr	
Translate Gregor Contract with Vuzem .5		
Personally delivered courtesy copy to Judge Koh .4	75.00/hr	67.50
Translate Gregor Contract with Vuzem .5		
review and save multiple e-mails of past week .2	400.00/hr	5,000.00
Receive Order to add Volvo .1		
Receive Order denying stipulation to extend time .1		
Review RICO research and notes, memo re revisions .4		
Locate contracts in Slovenian, translate to English .5		
Locate Lesnik and Papes bank records, identify payments .2		
Research Slovenian criminal code, save relevant portions .4		
Locate amended complaints in similar facts for class certification allegations for wages, analyze same 1.0		
Research TVPA text, save, review, memo re inserts .2		
Locate articles re TVPA, save, review .2		
Review and revise proposed Third Amended Complaint re wages claims and class certification allegations; revise TVPA allegations; make changes based		

Gregor Lesnik

Page 115

	<u>Rate</u>	<u>Amount</u>
on RICO suggestions		
9.0		
E-mail to Galin		
.1		
E-mail to Olivier		
.1		
10/30/2018 review Papes memos re issues for Third Amended Complaint		4,240.00
.1	400.00/hr	
Review e-mail from Galin of detailed RICO suggestions		
.1		
Make revisions per suggestions		
.5		
Revise amended complaint, save changes		
3.0		
Locate Vuzern officers, locations, and references, save internet information		
.2		
E-mail to clients questions about Eisenmann control		
.2		
Further revisions, save changes		
3.0		
Continued revisions, save ongoing changes, save penultimate draft to pdf		
3.0		
E-mails to and from Olivier re wages and class claims and proposed revisions		
.2		
E-mails to and from Galin re RICO and proposed revisions		
.2		
continue to review and revise proposed Third Amended Complaint, e-mails with Oliver, e-mails with attorney Galin;		1,200.00
3.0	400.00/hr	
10/31/2018 memo re insert re payments		5,480.00
.3	400.00/hr	
E-mail from Galin with comments on latest revision of draft complaint		
.1		
Research RICO authorities, prepare Memo re revisions concerning injuries to business or property		
.4		
Receive late e-mail from Olivier with form of amended complaint for wage/trafficking case; review same		
.2		
E-mail from Gregor		
.1		
Add to Third Amended Complaint final charging allegations, revise terms used to make consistent, review for use of terms, Check for spelling, grammar, check paragraph numbering, save; proof read; prepare to e-file		
12.0		
Save notice of filed pleading, save filed Third Amended Complaint		
.1		
E-mail to Baron		
.1		

Gregor Lesnik

Page 116

	<u>Rate</u>	<u>Amount</u>
E-mail to Rand		
.1		
E-mail to clients		
.1		
E-mail to Olivier		
.1		
E-mail to Galin		
.1		
11/1/2018 save all e-mails and notes from past week		880.00
.2 (partially charged)	400.00/hr	
add bookmarks to Third Amended Complaint for later review, save		
.2		
E-mails to and from Travancic re death of Bojan Sprah; review internet postings		
.2		
E-mail to Bojic about translating Third Amended Complaint		
.1		
E-mail from Stjepan, download and save attached medical reports		
.2		
Memo re issues for heart condition claim		
.2		
Call with Bernay, e-mail from defense counsel re proposed briefing schedule		
.2		
Call with docket clerk about summons on amended complaint		
.1		
Prepare draft amended summons, prepare draft attachment re defendants, prepare to upload proposed First Amended Summons		
.4		
Prepare FOIA regarding Sprah records		
.3		
E-mail to and from Olivier re scheduling		
.1		
11/2/2018 memo re causation and proof		1,720.00
.2	400.00/hr	
Receive issued summons, save, print		
.1		
Direct organization of summons for later service after translations		
.1		
Begin outline of opposition to anticipated defendants motion to dismiss		
.5		
Prepare draft analysis of anticipated service motion based on order in other unrelated case located from research		
.3		
Prepare draft of oppo to anticipated MTD with substantial inserts re standards on motion to dismiss		
3.0		
E-mail to Galin and Howard re defendants intent to file MTD even before reviewing pleading		
.1		

Gregor Lesnik

Page 117

		<u>Rate</u>	<u>Amount</u>
11/3/2018	call with Stjepan re status, other employees to participate, and Facebook records 1.0	400.00/hr	400.00
11/4/2018	locate Magna International articles, Magna terms and conditions, annual report, and identified projects, save print screens and information from investigation .5 Save Eisenmann Corporation information from Illinois Secty of State .1 Research service in Bosnia .3 Research service in Croatia .3 Research service in Slovenia .3 Save hcch articles re service .1 Prepare memo for service instructions including with all known and prior process servers, and for all defendants, including Eisenmann German entities, English entity, Slovenia entities, Croatian entities, newly added entities, including authorities for service 1.5 Memo re intended calls to counsel and parties .1 E-mails to and from Elite Processing re service in Illinois .2 E-mail to Olivier about speaking with clients .1 E-mail to process server in England .1 E-mail to counsel for Magna entities .1 E-mail to Process Service Associates re service in California .1 complete request to serve Volvo Car US Operations, Inc. by svs on CT Corporation; and for service on Eisenmann entities 1.0 Further calls with Stjepan re status, other employees to participate, facebook records, and potential associated counsel .3 call with Danijel re status, Gregor, service, potential associated counsel .5	400.00/hr	1,520.00
		400.00/hr	720.00
11/5/2018	US LESNICK Translating from english to German 8. E-mails to and from Brandywine Processing re service in Delaware .2 call with Olivier	75.00/hr 400.00/hr	600.00 1,600.00

Gregor Lesnik

Page 118

	<u>Rate</u>	<u>Amount</u>
.2 call with process service companies re service abroad		
.4 copy USB drive of draft documents		
.2 E-mail with process server for Illinois		
.1 E-mail with process server for California		
.1 Payment for services, and e-mail confirmation		
.2 (no charge) several e-mails with counsel re acceptable briefing schedule		
.2 Discuss briefing schedule with Olivier		
.1 Begin to machine translate amended complaint into German		
2.5		
11/5/2018 call with attorney Olivier		280.00
.2 calls with process service companies	400.00/hr	
.3 copy USB drive of draft documents		
.2 (partially charged)		
11/6/2018 US LESNICK		600.00
Translating from English to German	75.00/hr	
8.		
receive yesterday evenings filed defendant administrative motion re briefing schedule, declaration, and proposed Order	400.00/hr	1,480.00
.2 call with counsel for Magna entities, save memo		
1.0 calls with Danijel, Stjepan		
1.0 Locate and save further social media posts for clients and for Magna entities		
.1 Research re Baker Botts counsel		
.1 Research Magna International		
.1 Prepare waivers of service for Magna entities (3)		
.2 E-mails to Koons and Wrebel		
.1 E-mails to clients and to consulting / potential associate counsel about speaking with Olivier by skype		
.2 E-mail from Jane Gregory re UK service		
.1 E-mail from Elite re services in Illinois		

Gregor Lesnik

Page 119

	<u>Rate</u>	<u>Amount</u>
.1 Prepare declaration and opposition to defendants proposed briefing schedule for plaintiff response during holidays; prepare to e-file .5		
11/6/2018 call with counsel for Magna entities, save memo 1.0 calls with Danijel, Stjepan .3	400.00/hr	520.00
11/7/2018 call with Stjepan .3 Wire payment to translator .1 (no charge) e-mail from Olivier, prepare reply e-mail re defendants, service, Vuzem representation, collections, and Iodestar .2 E-mail to clients to speak to Olivier .1 add to draft opposition to anticipated motion to dismiss 1.0	400.00/hr	640.00
11/8/2018 e-mail from Bojic re translations .1 E-mail from Bernay re approval for mediator .1 Review Matz profile, e-mails with counsel .2 Calls from Judge Matz assistant .1 E-mail from Olivier about attending mediation .1 Locate, review and save Procedural Guidance, and Standing Orders re class action settlements, court notice in Local Rules; read all .3 Call to and e-mail to Taube .1 E-mail to Palmer .1 E-mails from Palmer .1 Multiple e-mails from Judge Matz re conflicts disclosure .1 Calls with clients .2 E-mail to counsel re availability for mediation .1 Email to Dawn Casey .1 E-mails to and from Elite Processing re proofs of service .1	400.00/hr	720.00


Gregor Lesnik

Page 120

		<u>Rate</u>	<u>Amount</u>
11/9/2018	Receive and review invoice and Proof of Service of Third Amended Complaint on Volvo Car US Operations, Inc., Eisenmann SE C/O Eisenmann Corporation, Eisenmann Anlagenbau GmbH & KG C/O Eisenmann Corporation, and, Eisenmann Anlagenbau Berwaltung GmbH c/o Eisenmann Corporation	400.00/hr	40.00
	e-mails with counsel re mediation, mediator, and scheduling		400.00
	.1	400.00/hr	
	Prepare letter to UK Process		
	.2		
	Check court calendar, call to and e-mail to and from counsel about timing of response to proposed stipulations re briefing schedule; update calendar entries		
	.3		
	E-mail from Casey about visa issues		
	.1		
	Receive and review yesterday e-mail from FedArb and Judge Matz, save, save attachments		
	.2		
	Memo re machine translation into polish		
	.1		
11/10/2018	receive invoice for and proofs for service in Illinois	400.00/hr	1,280.00
	.1		
	Review inserts for 3AC, prepare fact allegations by reference to paragraphs of 3AC, prepare insert to add to draft opposition to anticipated motion to dismiss		
	3.0		
	Receive applications and orders for appearances by phone		
	.1		
11/11/2018			600.00
	formatting draft oppo in Word		75.00
	Time: 1	75.00/hr	
	conduct investigation re visa fraud, Tesla working conditions		240.00
	.2	400.00/hr	
	E-mail to Ontario process servers		
	.1		
	Call with mentor Jim Kealey about case, facts and potential assistance, e-mail to Kealey		
	.3		
11/12/2018	Receive and review faxed Order Setting Briefing Schedule and Page Limits of a Consolidated Motion to Dismiss	400.00/hr	40.00

Gregor Lesnik

Page 121

		<u>Rate</u>	<u>Amount</u>
11/12/2018			300.00
	Call with counsel about stipulations for dates to file and to allow judge to rule		200.00
	.2	400.00/hr	
	receive, save, print and calendaring of Order on administrative motion re scheduling		
	.1		
	E-mails to and from Olivier re schedule for review and for scheduling on motions		
	.1		
	E-mails to defense counsel that proposed stipulations are moot		
	.1		
11/13/2018	e-mails by counsel and WCD to Judge Matz and to FedArb		40.00
	.1	400.00/hr	
11/14/2018	US LESNIK		75.00
	Organize, gather and download various pleadings	75.00/hr	
	1.0		
	e-mail from Judge Matz		320.00
	.1	400.00/hr	
	E-mail to counsel and judge re mediation confidentiality rules		
	.1		
	E-mails with clients about mediation and travel		
	.1		
	Research and memo re preserving phone data, encrypted e-mail, data preservation, e-mail threads, and discovery obligations, save articles		
	.2		
	Extract inserts re facts for intended opposition to anticipated MTD		
	.2		
	Discuss with staff checking on current status of saving and organizing all digital and paper copies of pleadings		
	.1		
11/15/2018	Receive and review letter from CT stating that they Eisenmann Anlagenbau Gmbh Co. KG is not listed on their records or on the records of the State of CA	400.00/hr	40.00
	letter from CT stating that they Eisenmann SE is not listed on their records or on the records of the State of CA		
	Invoice from Elite Process Service, Inc.		
	Affidavit of Service and Proof of Service for Eisenmann Anlagenbau Gmbh Co. KG c/o Luc Attian, Registered Agent in IL		
	Affidavit of Service and Proof of Service for Eisenmann SE c/o Luc Attian, Registered Agent in IL		
	Affidavit of Service and Proof of Service for Eisenmann Anlagenbau Verwaltung Gmbh c/o Luc Attian, Registered Agent in IL		

Gregor Lesnik

Page 122

	<u>Rate</u>	<u>Amount</u>
11/15/2018 call, memo to file and email to Chad of Process Service Associates re status .3	75.00/hr	22.50
calls with Stjepan, e-mail with ticket service re travel .3	400.00/hr	1,280.00
Receive and save itinerary, calendar; receive and save invoice .1		
Research Krawitt v Infosys case, motions, oppositions and decisions; save pleadings 1.8		
Prepare and direct staff to assist in preparing table of contents and table of authorities for anticipated oppo to MTD .2 (partially charged)		
research articles re contrary FCA rulings .2		
Review final of machine translation into German of Third Amended Complaint .3		
Multiple e-mails from Judge Matz and FedArb .1		
E-mails with counsel about conference call .1		
E-mail of counsel to Judge Matz .1		
11/16/2018 calls with Stjepan .2	400.00/hr	160.00
Prepare for call with Olivier .3 (no charge)		
call with Monique Olivier about status, and her new firms concerns; memo to file 1.0 (no charge)		
e-mail from Judge Matz re issues for conference call .1		
E-mail from Koons and Wrebel for Magna Intl .1		
E-mail to Olivier summarizing issues discussed 1.0 (no charge)		
11/19/2018 Receive and review original Proofs of Service from Smith Process Server in California	400.00/hr	40.00
save machine translated German version of 3AC into word processing .1	400.00/hr	600.00
E-mail with counsel and FedArb about persons on call .1		
E-mail from Olivier about intended call to defense counsel and consultation with partners .1		
mediation conference call with Judge Matz 1.0		
Discuss with staff cross-reference of FOIA spreadsheet and Rule 26 Disclosure with our hand entered worker spreadsheet		

Gregor Lesnik

Page 123

		<u>Rate</u>	<u>Amount</u>
	.1 E-mail to Olivier notes of call with mediator Matz .1		
11/20/2018	US Lesnik Call from Ziropiannis and Petkon, memo to file .1 Updating B1 Worker spreadsheet 4.0	75.00/hr	307.50
	call with Lewis Ziropiannis, counsel for Volvo .3 Prepare updated Rule 26 Disclosure .5 Review e-mail from Papes with attachments of work hours obtained from other workers, save, convert to pdf .2 E-mails between defense counsel re scheduling for mediation .1 Prepare draft demand to Eisenmann and Tesla per Judge Matz directions 1.5 Organize to send USB to Olivier 1.0	400.00/hr	1,440.00
11/21/2018	prepare to file, and review with staff, proofs of services on all Eisenmann entities .2 E-mail from and to counsel for Volvo re our agreement of yesterday .1 E-mail to counsel for Magna entities; e-mail from counsel .1 E-mails from and to Sandra Bojic re translations into both Croatian and Slovenian .1 Research current inflationary calculation for FCA penalties, save FR and Justice Dept publications re same .3	400.00/hr	320.00
11/22/2018	e-mail from Bojic about translations into both Croatian and Slovenian .1	400.00/hr	40.00
11/24/2018	locate Eisenmann v Durr pleadings re holder of patent claims for suit, save .2 Save memo re Tesla payment amounts .1 Revise and add to categories, summary and amounts in draft demand to Tesla and Eisenmann .4 Locate press release re new Toyota plant .1	400.00/hr	320.00

Gregor Lesnik

Page 124

	<u>Rate</u>	<u>Amount</u>
11/26/2018 Foster PC retainer agreement - second - pleadings consultation re RICO cause of action; \$700/hr Foster; \$400/hr Galin		5,000.00
US LESNIK		37.50
File Eisenmann entities and Volvo in CA, IL, and DE	75.00/hr	
.5		
call with Webber		1,600.00
.1 (no charge)	400.00/hr	
Email to R Casale re FIOA information		
.1		
E-mail to Vandenberg and Taube		
.1		
E-mail with Judge Matz		
.1		
E-mail from Bernay		
.1		
Receive notices to re-file proofs of service		
.1		
Receive notice of appearance for Volvo		
.1		
Prepare calculation of California wages class claim based on information known to date		
1.0		
E-mail from Kealey		
.1 (no charge)		
call with counsel for Magna entities		
.1		
call with Stjepan		
1.6		
call with mentor attorney Jim Kealy		
.4 (no charge)		
Call from and e-mail to and from counsel for Volvo, approve stipulation		
.1		
E-mails from and to Judge Matz and FedArb		
.1		
Locate articles and corporate information for Magna, d.o.o.; save; locate Magna Intl annual reports, save, call to counsel for Magna entities		
.4		
Review for filing proofs of service on German Eisenmann entities		
.1		
11/27/2018 e-mail to and wire funds to Foster, PC		280.00
.1	400.00/hr	
receive Order denying stipulation to extend time for Volvo to respond		
.1		
Multiple e-mails with Ziropiannis for Volvo		
.2		
Prepare insert re settlement for anticipated motion to dismiss		
.1		
Prepare in final to send settlement demand to Eisenmann and Tesla per		

Gregor Lesnik

Page 125

	<u>Rate</u>	<u>Amount</u>
Judge Matz as soon as defts sign the agreement to mediate .2		
11/28/2018 Research Magna entities, print out company findings	75.00/hr	75.00
receive proof of service on Gregurec, Ltd.; e-file .1	400.00/hr	960.00
Email to UK Process .1		
E-mail from Taube, call to attorney Velton .1 (no charge)		
e-mails between counsel and clerk re filing .1		
calls with Jim Kealey 1.0		
Locate and save documents, articles, press releases, company website and other information for relationship between Magna, d.o.o. and Magna, International .7		
Call with Monique Olivier .3		
E-mail to counsel re sending settlement demand upon Tesla execution of mediation agreement .1		
11/29/2018 receive notice of and save Motion to Dismiss, and exhibits; e-mail to staff to save, print and organize for filing .1	400.00/hr	280.00
Skim review .2		
prepare additions to and save updated opposition to motion to dismiss .4		
11/30/2018 updated cites in table of authority and TOC for the oppo motion Time: 2	75.00/hr	150.00
update calculation of damages for class wages claims .5	400.00/hr	1,200.00
Update draft demand .1		
Review and update summary of wages laws .1		
Add to draft opposition to motion to dismiss 1.5		
Discuss with Stacie in office work on Lesnik oppo to Defts Joint MTD .1		
E-mail from Walter H. Skip Walker, III about analysis of pleadings and judges order on MTD to 2nd Amended Complaint .2		
E-mails from Bernay and to counsel that waiting for mediation agreement to be signed by defendants to send out demand		

Gregor Lesnik

Page 126

	<u>Rate</u>	<u>Amount</u>
.1 Receive and Review Volvo corporate disclosure		
.1 Receive and review defendants proposed Order on Motion to Dismiss		
.1 E-mail to Walker firm attaching relevant pleadings, disclosures and documents		
.2		
12/2/2018 call with Stjepan		800.00
1.0	400.00/hr	
call with Gregor		
.3		
meeting with Danijel		
.3		
call with Jim Kealy		
.4		
12/3/2018 Call from Mr. Gallon, memo to file		82.50
.1	75.00/hr	
Organize file		
1.0		
send draft Oppo to Deft Joint MTD to Foster and Gallin		920.00
.1	400.00/hr	
Locate and save cases cited by defendants		
1.0		
Locate and save cited statutes		
.5		
E-mails with Webber		
.1 (no charge)		
e-mail from, and call with Matt Galin		
.2		
Add to opposition to motion to dismiss		
.5		
12/4/2018 Gather documents and organize Proofs of service and Pleadings		112.50
1.5	75.00/hr	
save e-mails with consulting attorneys and clients		1,640.00
.1	400.00/hr	
Call from attorney Foran about Tesla changes to mediation agreement		
.2		
Call to Kim Friday re government position re settlement		
.1		
Save and evaluate defense article of recent developments favorable to our FCA claims in this case; enhance OCR appendix of authorities		
.8		
Receive order denying motion to quash as moot		
.1		
E-mails from Foran to FedArb, receive and save mediation agreement with Tesla modifications		

Gregor Lesnik

Page 127

	<u>Rate</u>	<u>Amount</u>
.2 E-mails with attorneys at Walker firm about scheduling meeting		
.1 E-mails with Walker firm re proposed demand to Eisenmann and Tesla		
.1 Receive e-mail of intended agreement by Eisenmann with Teslas revised mediation agreement		
.1 Add to, revise and prepare penultimate draft of demand, brief, and attached calculations of damages		
2.0 E-mail settlement demand to defense counsel		
.1 E-mail to Walker		
.1 E-mail to Papes for information about Magna entities		
.1		
12/5/2018 Calls to Illinois District Court, memo to file		22.50
.3	75.00/hr	
went to Santa Clara County Law Library to look up case authority in the Omnibus Motion to Dismiss 3AC		112.50
Time: 1.5	75.00/hr	
receive and save letter from Kim Friday re US settlement guidelines for FCA		600.00
.1	400.00/hr	
travel to and from San Francisco		
2.0 (no charge)		
conf with Skip Walker, Tim Hamilton, and Jim Kealy		
2.5 (no charge)		
complete to exchange mediation brief with calculation of damages		
1.0		
E-mail from counsel re agreement to form of mediation agreement		
.1		
E-mails with counsel for Magna entities		
.1		
Multiple e-mails between defense counsel and Judge Matz about form of mediation agreement		
.2		
12/6/2018 begin preparations for mediation		75.00
1.0	75.00/hr	
review e-mail from Papes re Magna entities		480.00
.1	400.00/hr	
Review defendants mediation statement and e-mails from counsel for Eisenmann		
.2		
E-mails to mediator and counsel re confidentiality, and re proposed scope of mediated agreement		
.3		

Gregor Lesnik

Page 128

		<u>Rate</u>	<u>Amount</u>
	E-mail to Walker firm		
	.1		
	E-mail from counsel for defendants about appearance at mediation of individual		
	.1		
	E-mail from Judge Matz		
	.1		
	E-mail from Walker		
	.1		
	E-mail to clients forwarding e-mail from Judge Matz		
	.1		
	E-mail from Olivier		
	.1		
12/7/2018	Formatting and updating the tables in MPA		131.25
	Time: 1.75	75.00/hr	
	Conf with Jim Kealy		360.00
	.2	400.00/hr	
	E-mails from and to Galin re status and timing of draft of MPA in opposition to MTD		
	.1		
	E-mail from Fed Arb, review and execute agreement, e-mail to FedArb; wire funds		
	.1		
	E-mail from Teslas counsel re appearances at mediation		
	.1		
	E-mail from Walker about no attendance by Travancic, e-mail to Walker		
	.1		
	E-mail from and to Judge Matz re attendance at mediation		
	.1		
	E-mail mediation disclosure forms to clients		
	.1		
	E-mails from Walker to Judge Matz, e-mails from Judge Matz to Walker		
	.1		
	Conference with Jim Kealy		360.00
	.4	400.00/hr	
	Calls with Stjepan, Gregor, and Danijel Travancic		
	.5		
12/8/2018	calls from and e-mails with Danijel, Gregor and Stjepan denial of ticket for Stjepan		480.00
	.2	400.00/hr	
	evaluate options for travel, locate and upload DHS form 590 Traveler inquiry		
	.3		
	E-mails to and from Papes		
	.1		
	E-mail to DHS		
	.1		
	Calls with consultant, Receive and save passport and visa, extract caption page of filed 3AC, e-mail to consultant		

Gregor Lesnik

Page 129

	<u>Rate</u>	<u>Amount</u>
.2 E-mail to Asst USAG Friday		
.1 E-mail from Papes with statement of denial of entry		
.1 E-mail to Papes, return e-mail with copy of photo of envelope		
.1		
12/9/2018 Formatting and updating the tables in MPA Time: .25	75.00/hr	18.75
Receive and review proof of service on Gregurec Limited from United Kingdom Process	400.00/hr	40.00
e-mails to all re mediation schedule and travel arrangements and mediation process	400.00/hr	1,120.00
.1 E-mail from and to Friday re denial of entry for Papes		
.1 E-mails with clients about mediation		
.1 E-mails with Bojic, Save, sign, and issue wire transfer payment for translation into Slovenian		
.2 Discuss with staff memo to identify authorities in defendants current MTD that were not cited in prior MTD; review memo of same		
.1 Add to draft MPA in opposition to motion to dismiss		
2.0 E-mail to clients about having Gregor present, discuss flight and travel arrangements		
.2		
12/10/2018 Gather, scan, copy and organize and index documents for mediation Prepare Mediation Index 6.0	75.00/hr	450.00
12/11/2018 Gather, scan, copy and organize and index supporting documents for mediation Prepare Mediation Supporting Docs Index 7.0	75.00/hr	525.00
calls with Danijel about Stjepan Papes visa being recalled, changes in flights on second attempted travel	400.00/hr	960.00
.3 Calls about status of Gregor Lesnik flights		
.2 Add Gregor to settlement authority list for mediation		
.1 Attempted call to Kim Friday		
.1 (no charge) e-mail to counsel and mediator about attendees		

Gregor Lesnik

Page 130

	<u>Rate</u>	<u>Amount</u>
.1 Organize files, notes and documents for mediation		
1.5 Direct staff to obtain corporate articles and information for foreign entities		
.1 E-mails with counsel re status		
.1		
12/12/2018 Research KB MONT doo, save to server		82.50
.8	75.00/hr	
Print out pages of B1 Visa spreadsheet and fax to Mediation		
.3		
conference with Gregor, travel to and from and attend all day mediation with Eisenmann and Tesla, neutral, Judge Howard Katz, held at Boies, Schilling, 1999 Harrison Street, Oakland; conference with Skip Walker regarding further activities; calls with Stjepan about status	400.00/hr	4,880.00
12.0		
E-mail to Galin		
.1		
E-mail to Eschoo		
.1		
12/13/2018 texts with Stjepan		2,440.00
.2	400.00/hr	
E-mail from CBP Info Center		
.1		
Research customs regs for waivers for fraud		
.2		
E-mail to Kealey, and from Kealey		
.2		
Prepare to do list based on discussions with Walker following mediation		
.8		
E-mail to Walker office, e-mail from Koenig confirming plan		
.1		
Call with attorney Friday, e-mail to Friday		
.2		
Call to counsel for Magna		
.2		
Prepare dismissal from 3AC RICO class claim		
.3		
Call to Warner Cross, E-mail with Wagner of Gibson, Dunn		
.1		
Prepare proposed dismissal for Dicastal		
.2		
Calls to and e-mails with attorneys Lee, Wagner, Ta, Petty, Bifoss, Zirgogiannis, and others		
1.5		
Prepare dismissals to dismiss causes of action against specified persons, and dismissals of specified persons pursuant to checklist		
2.0		

Gregor Lesnik

Page 131

	<u>Rate</u>	<u>Amount</u>
12/14/2018 further calls and e-mails with defense counsel about dismissals including Petty, Lee, Heintz, Wagner 1.0 Research re recoverable travel time .3 Research recovery of mediation costs .2 Research video and confrontation clause .1 Update status of to dos .2 Research re settlement credits .1 Research personal jurisdiction waived by litigating merits .4 Research reversals of dismissals of FCA .2 Research standing re class action claims .2 Research personal jurisdiction .1 Add to draft MPA in opposition to motion to dismiss 1.0 E-mail from Judge Matz .1	400.00/hr	1,560.00
12/15/2018 discuss Gregor flights from SFO to return .2 Further e-mails with Lee and Wagner .2 E-mail to counsel confirming agreements re dismissals .2	400.00/hr	240.00
12/16/2018 save photos of tickets, passports and visas re travel to and from mediation .1 Add to draft opposition to mtd 1.0 Prepare administrative motion for leave to amend heading; prepare proposed stipulation, e-mail to counsel proposed stipulation, save as exhibit .3 E-mail to counsel for Eisenmann that time to respond has expired .1 review and revise opposition to consolidated motions to dismiss	400.00/hr	600.00 160.00
12/17/2018 update to do list .2 Prepare revised dismissals of specified C/A against specified defendants; save all to pdf; check for accuracy and completeness against list 1.0 E-mails with Wagner, Lee, Bernay, and Petty re status of consents for	400.00/hr	2,560.00

Gregor Lesnik

Page 132

		<u>Rate</u>	<u>Amount</u>
	dismissals, calls to Petty, e-mail to counsel		
	.6		
	File dismissals of specified causes of action and defendants to causes of action, receive confirmation of e-filing		
	.4		
	Receive government consent to dismissal of specified defendants		
	.1		
	Prepare dismissals of specified defendants, compare to list, file dismissals of specified defendants		
	2.0		
	Research authorities cited in and analysis from TRG, Federal Civil Procedure Before Trial, Memo re inserts to MPA		
	2.0		
	E-mails with Walker office		
	.1		
12/19/2018	review redlines from attorney Galin re phrasing for RICO		1,880.00
	.1	400.00/hr	
	add to draft Plaintiffs opposition to consolidated motions to dismiss		
	2.5		
	Discuss additions to and updates of tables		
	.3		
	Proof and revise MPA		
	.6		
	File Opposition to Motion to Dismiss		
	.1		
	E-mail to Walker office		
	.1		
	Prepare draft declaration to support entry of default against Eisenmann SE		
	1.0		
12/20/2018	receive defendant opposition to admin motion to amend heading		40.00
	.1	400.00/hr	
12/22/2018	e-mail from Bojic re status of Slovenia translation		40.00
	.1	400.00/hr	
12/23/2018	research re unambiguous statutes		440.00
	.5	400.00/hr	
	Prepare FOIA re arrests		
	.3		
	Research re FFT Production Systems, Inc. hiring We-Kr in 2018 in South Carolina		
	.2		
	E-mail from and to Galin		
	.1		
12/27/2018	prepare declaration supporting entries of default, locate exhibits to support service, save documents for exhibits, revise declaration, revise request for entry of default		1,040.00
	1.2	400.00/hr	
	Prepare similar declaration and request for default against Eisenmann		

Gregor Lesnik

Page 133

	<u>Rate</u>	<u>Amount</u>
Anlagenbau GmbH .4 Prepare similar declaration and request for default against Eisenmann Anlagenbau Verwaltung GmbH .4 Prepare to e-file and e-file requests to enter default .1 Prepare request to enter default and declaration support request against Gregurec, Ltd .5		
12/29/2018 receive, download and save Slovenian translation .2 Prepare insert for Joint CMC Statement .2	400.00/hr	160.00
12/31/2018 Worked on Service for Third Amended Complaint 1. save memo of additional costs for flights .2 E-mails with counsel, receive defendants proposed Joint CMC Statement, review .3 prepare memo re inserts, review, revise memo re inserts, revise Joint CMC Statement, e-mail to counsel .7 Memo re bases of claims against Eisenmann SE .2	75.00/hr 400.00/hr	75.00 560.00
1/1/2019 save remotely revised draft Joint CMC Statement; review same .1	400.00/hr	40.00
1/2/2019 save e-mails of past week .1 E-mails to and from counsel re changes to CMC Statement .2 Call with Skip Walker firm about CMC Statement .1 complete Joint CMC Statements; receive e-filed Statement .3	400.00/hr	400.00
1/3/2019 Prepared Customs Declaration CN 22 forms for service by mail	75.00/hr	225.00
Receive and review letter from CT rejecting service of Eisenmann SE	400.00/hr	40.00
e-mail to Walker .1 E-mail to clients .1	400.00/hr	1,280.00

Gregor Lesnik

Page 134

	<u>Rate</u>	<u>Amount</u>
Save Croatian translation of Third Amended Complaint		
.1		
Prepare service list		
.2		
Prepare waivers of service for all Slovenian and Croatian defendants including for business and service addresses if different		
1.4		
Direct mailing organization, scan waivers, scan envelopes		
.3		
1/4/2019 call with Jim Kealey		480.00
.2	400.00/hr	
Prepare summary of law for response to motions to quash, prepare e-mail to Walker firm about opposition to motion		
1.0		
1/5/2019 Prepared Customs Declaration CN 22 forms for service by mail		300.00
3.0	75.00/hr	
Researched Slovenia and Croatia Server for Process		
1.0		
search for Slovenian Process Service Network, locate and save information		80.00
.2	400.00/hr	
1/7/2019 direct organization of mailing of waivers		160.00
.1	400.00/hr	
Receive e-notice of January 4 continuing CMC		
.1		
Receive e-notice of entries of default against Eisenmann German entities and of Gregurec, Ltd.		
.1		
Receive reply e-mail from Process Net for service in Slovenia and Croatia		
.1		
1/8/2019 Receive and review letter from Counsel to Eisenmann Corp. enclosing Defendants Motion for Sanctions and Declaration of Kaitlyn Murphy in Support of Defendants Motion for Sanctions	400.00/hr	40.00
email sent on 1/7/19 from DGR Legal Process Service re Service abroad.		
email sent on 1/7/19 from Process Servers Network re Service abroad.		
receive Eisenmann and Tesla reply in support of motion to dismiss, chart of claims, save, print, review	400.00/hr	800.00
.4		
E-mail from Ta with attachment of demand to dismiss Lesniks claims; download, save, review, review attachments to demand letter		
.4		
Research cited authorities, save		
.2		
Prepare memo of response to defendant reply in support of MTD		
1.0		

Gregor Lesnik

Page 135

	<u>Rate</u>	<u>Amount</u>
1/9/2019 Prepared new spreadsheet for Amended Third Complaint service	75.00/hr	37.50
e-mail from Chiem, analyze decisions and status of FCA claims, prepare draft response; forward to Walker for review; e-mail from Peter Koenig; e-mail to Chiem	400.00/hr	600.00
1.0		
review updated service list, review notes of calls with persons with other companies,		
.2		
E-mails with clients re medical records and status		
.1		
For opposition to motion to vacate, locate prior letters to counsel and save to pdf,		
.2		
1/10/2019 e-mail from Koons for Magna International, Inc.		40.00
.1	400.00/hr	
1/14/2019 research FRCP 41(d) regarding recoverable costs		240.00
.3	400.00/hr	
research bases for recoverable costs for defendants on wages claims		
.3		
1/16/2019 Call from Eric Koon memo to file		7.50
	75.00/hr	
1/21/2019 Update FOIA spreadsheet		37.50
	75.00/hr	
1/22/2019 Update FOIA spreadsheet		75.00
	75.00/hr	
research re Stored Communications Act		240.00
.2	400.00/hr	
Prepare spreadsheet of FOIA requests		
.2		
Research public discussion by attorneys about cases; 9th Circuit SLAPP procedures		
.2		
Locate articles of and about Skip Walker		
.2 (no charge)		
1/23/2019 worked on FOIA Spreadsheet		22.50
	75.00/hr	
research authorities re settlement, save decisions		320.00
.8	400.00/hr	
1/24/2019 Prepared letter to International Process Service listing detailed instructions		75.00
	75.00/hr	

Gregor Lesnik

Page 136

	<u>Rate</u>	<u>Amount</u>
1/24/2019 prepare letter response to demand by defendants to dismiss claims by Lesnik 2.5 E-mails to counsel for defendants .1 E-mail to Walker firm re status .1	400.00/hr	1,080.00
1/28/2019 revise and complete letter directing service on Slovenian and Croatian defendants, calls with process servers for foreign service, memos to file, e-mails with Process Net, e-mails with DGR Legal, e-mails with Croatian counsel Marjan Aleksic 1.2 Conduct research re Judge Koh rulings including saving relevant Orders in other cases re motions to file under seal, objections to evidence, discovery cut off and exceptions, procedures for witness lists and exhibits, and for trial briefs, deadlines and closing arguments, expert witness topics, admissions by consultant of party, and admissibility of depositions taken outside of United States 1.0 (partially charged)	400.00/hr	880.00
e-mails from and to Process Net clarifying service requests .2 E-mails with DGR Legal about service .1 Review assigned Judge Khos orders in unrelated action, save orders for reference 1.0 E-mails with Odvetnik Marjan Aleksic re service .1	400.00/hr	560.00
1/29/2019 receive and save e-mails from DGR Process Service and from Process Net .1 Discuss with staff obtaining records of other Eisenmann case through Federal Record Center .1 Observe closing arguments, memo to file re procedure for Judge Koh, discuss with counsel discovery and trial presentations 3.0	400.00/hr	1,280.00
Calls to Chicago District Court re acquiring copies of pleadings in Eisenmann v Regenerative Env., memo to file Register with Federal Records, begin order .5	75.00/hr	37.50
contact federal record center and Illinois District Court for files re Eisenmann patent claims and other lawsuits .2 observe trial proceedings 2.0 (no charge)	400.00/hr	80.00

Gregor Lesnik

Page 137

		<u>Rate</u>	<u>Amount</u>
1/30/2019	research citation of unpublished Ninth Circuit decisions, save memo to file .2 Receive e-mails between counsel for Eisenmann and courtroom deputy, calendar hearing date, calendar opposition due date based on tentative hearing date, revise earlier drafts of oppositions to anticipated motions .4 Prepare draft of declaration in opposition to anticipated motion to set aside default .5 Add to prior draft of opposition to anticipated motion to vacate .2 Save memos of prior research re class actions, statistics, experts, class notices; and re special employment; and re specific jurisdiction .1	400.00/hr	560.00
	e-mails between Ta and clerk about scheduling motions re service .1 Research Ninth Circuit rule re unpublished decisions .1 Prepare draft declaration in opposition to motion to quash 2.0 Prepare outline for and begin draft MPA .4 Research re statistics in courtroom .2 Research re class certification experts, save article .1 Research re class notices .1 Research special employment, analyze as it applies to Tesla .2 Research re specific jurisdiction .1	400.00/hr	1,280.00
1/31/2019	receive e-mails about scheduling hearing on German Eisenmann entities motions to quash and to set aside court clerk defaults .2 Calendar hearing date and opposition due date .1	400.00/hr	120.00
2/1/2019	receive, download, save and review German Eisenmann entities motion to quash and motion to set aside default; calendar hearing and opposition due date; add to existing draft of MPA in opposition to motions; locate all e-mails with Bernay, save e-mails and other documents for proposed exhibits, research cases cited by defendants, add to MPA in opposition to motion to set aside default, add to draft declaration; evaluate significance of calls with Bernay 4.0	400.00/hr	1,600.00
	e-mails from Process Service Network re 13 Hague Services in Slovenia and for 3 Hague Services in Croatia, save .1	400.00/hr	2,080.00

Gregor Lesnik

Page 138

	<u>Rate</u>	<u>Amount</u>
Receive and save Eisenmann motion to quash, motion to set aside default, proposed Orders; print, review .3		
Locate for exhibits letters between counsel re filing stipulation for defendants, service, and due dates; save to pdf, organize for exhibits .8		
Add to draft opposition to motion to quash .5		
Begin draft declaration in opposition to motion to vacate 2.0		
Prepare initial draft of MPA in opposition to motion to vacate 1.5		
2/2/2019 research re service and re defaults, save memo, add to draft MPA in opposition to motion to quash 1.5	400.00/hr	2,120.00
Research re motion to set aside, review and revise and prepare penultimate draft of MPA in opposition to motion to set aside default, discuss with staff formatting, save 1.2		
Review prior filings, research for changes in statutes; Prepare administrative motions to serve ISM Vuzem USA, Inc., including proposed Orders, convert to pdf and upload, review local rules for changes in submission of proposed orders, prepare e-mail to Judge Koh 1.4		
Prepare draft declaration in opposition to German Eisenmann entities motions 1.2		
Motion Oppo Vacate TOC, TOA-Table of Authorities Time: 1	75.00/hr	75.00
research re foreign service under California law, memo .2	400.00/hr	720.00
Locate and review form for Request for Service Abroad .1		
Add to draft opposition to motion to quash .2		
Prepare second administrative motion to serve ISM Vuzem USA, Inc., order .5		
Prepare second administrative motion to serve Vuzem USA, Inc., order .2		
E-mail to Judge Kho .1		
Add to draft declaration in opposition to motion to vacate .5		
2/3/2019 evaluate further evidence relevant to service on Eisenmann entities .5	400.00/hr	200.00
2/4/2019 e-mail from Papes re services in Croatia and Slovenia, save attachment, translate to English and save; call with Stjepan about service, workers, status and Eisenmann issues; e-mail to counsel re service; e-mail to counsel re	400.00/hr	440.00

Gregor Lesnik

Page 139

	<u>Rate</u>	<u>Amount</u>
worker Robert Hernaus; received rejected e-mail address responses, e-mails with Stjepan, further attempted e-mails 1.0 Direct delivery of administrative motions to Judge Kohs courtroom .1		
2/4/2019 personally deliver filed documents to Judges Chambers .4	75.00/hr	30.00
e-mails with Papes about contact for service and explanation, google translate, evaluate options .3 E-mail to Odvetnik Tomaz Germ .1 E-mail to Odvetnik Maja Vidovic .1	400.00/hr	200.00
2/5/2019 e-mails from Stjepan, re-send e-mails to Odvetnik Vidovic re service, and to Odvetnik Germ re Robert Hernaus .1 Call to Ingo Brauer .1	400.00/hr	80.00
Receive and review letter from Jill Eggleston, Director of FOIA Operation re requested information	400.00/hr	40.00
Further e-mails with Papes .1 Send revised e-mail addresses .1 Call to Ingo Brauer .1 Receive orders to serve US based Vuzem entitiiese .1 Discuss obtaining records through US National Archives .1	400.00/hr	200.00
2/6/2019 receive e-notice of, download, save and print Orders granting administrative motions to serve ISM Vuzem USA, Inc. and Vuzem USA, Inc. .1	400.00/hr	40.00
Locate Eisennann v Regenerative Environment Company, Inc. court documents and order .5	75.00/hr	37.50
2/7/2019 discuss service on Vuzem US entities .1	400.00/hr	40.00
Receive and review Certified Mailing Receipt re ISM Vuzem USA	400.00/hr	40.00

Gregor Lesnik

Page 140

	<u>Rate</u>	<u>Amount</u>
2/7/2019 Prepared for service Vuzem USA and Served, personally went to Post Office .5 Prepared for service ISM Vuzem USA .4 assist in preparing documents for service on ISM Vuzem USA, Inc. and Vuzem USA, Inc.; review service instructions; direct scan of all documents being served .4	75.00/hr 400.00/hr	67.50 160.00
2/9/2019 analyze further activities concerning Croatian and Slovenian service .1 Analyze further activities concerning Eisenmann entities .2	400.00/hr	120.00
2/10/2019 locate and save jury instructions for reverse FCA .1 Locate LAX declarations regarding Eisenmann Corporation presence in California .1 Prepare portions of facts for identification of exhibits to be located for exhibits .3 research jury instruction for reverse FCA; save .2	400.00/hr 400.00/hr	200.00 80.00
2/11/2019 Receive and review returned returned returned Bosnia translated Complaint e-mail from and to Papes and Lesnik re status of motion to dismiss, filings, and legal analysis .3 locate filings re German Eisenmann entities, save into folder for exhibits to declaration in opposition to motions to quash and to set aside; conduct research re Delaware corporate information 1.0 Add to draft declaration .3 E-mail from attorney .1 Calls with Stjepan and Danijel re service in Slovenia and Croatia .5 Prepare e-mail re service .4 Direct staff to locate articles for Eisenmann Anlagenbau Verwaltung and assist in download .1 (partially charged) begin to locate documents from our Rule 26 production for evidence on relationship of the Eisenmann entities .5 begin to index as exhibits by alpha for German Eisenmann entities .2	400.00/hr 400.00/hr	40.00 2,360.00

Gregor Lesnik

Page 141

	<u>Rate</u>	<u>Amount</u>
Research all cited authorities by Eisenmann entities, download and save for further analysis 1.0 (partially charged) begin review and analysis of cited authorities, prepare draft memo for inserts to MPA 1.5		
2/11/2019 locate articles and corporate status information for Eisenmann entities, save as exhibits to draft declaration 1.0 E-mail to clients re status, and summary of arguments on pleadings motions and oppositions .3 E-mail from Croatian attorney stating best way to serve is to contact notary public and assign service to notary; forward to clients .1 Call with Papes, call with Travancic .2 Prepare detailed letter of what to serve, where to serve, and required service by both post and in person .5 Save details from secretary of state websites re Eisenmann entities .2	400.00/hr	920.00
2/12/2019 further research on German Eisenmann entities cited authorities, save cited authorities .2 Review our Rule 26 Production to locate and extract as individual exhibits Eisenmann entities documents; locate confirmation on internet of Bernd as Eisenmann SE manager; locate other documents, organize for exhibits 3.5 Direct staff in preparation of exhibit dividers for filing exhibits .1 (partially charged) add to Declaration .2 Direct staff to organize, name and prepare index of exhibits for declaration .3 (partially charged) Direct staff in preparing list of exhibits .1 Continue review and analysis of defendants cited authorities, add to memo for insert to MPA on motion to quash 2.5 E-mail from Papes, e-mail to Papes of documents to serve .2	400.00/hr	2,840.00
Exhibits for Oppo Mnt to vacate, label, combine	75.00/hr	225.00
download One legal invoices .1 Prepared Exhibit cover pages A through ZZZZ .9	75.00/hr	172.50

Gregor Lesnik

Page 142

	<u>Rate</u>	<u>Amount</u>
Translate documents .3 Organize file .8 Check status on patent pleadings .2		
2/12/2019 organize, scan, save, index, and identify exhibits for opposition to motions to quash 5.0 locate provisions in Eisenmann contracts re jurisdiction, save relevant text .2 Locate Eisenmann press releases and website postings re participation and actions in US .2 Add text to draft declaration in opposition to motion to quash .4 Prepare inserts to draft MPA re permissible service under FRCP, and under Delaware, California and Illinois law .3 E-mail from Papes re notaries in Croatia, E-mail to Papes documents to serve .2	400.00/hr	2,440.00
2/13/2019 further research on German Eisenmann entities cited authorities 1.0 (partially charged) extract analysis from German Eisenmann entities own cited authorities to add to MPA in opposition to motion to quash .5 Locate additional documents to identify directors and officers for all Eisenmann entities; direct staff to to organize, name and prepare index of exhibits for declaration 1.7 Add to and revisions to draft declaration .8 Add to draft MPA in opposition to motion to quash 3.0 Call from manager of Azalea Hills Apartments re service on Branko Tomas as registered agent for ISM Vuzem USA, Inc .1 Download and review declarations in support of defendants Eisenmanns motion to quash .2	400.00/hr	2,920.00
Prepared Exhibit List for Declaration of William C. Dresser in Opposition to Defendants' Eisenmann SE, Eisenmann Anlagenbau Verwaltung GmbH, and Eisenmann Anlagenbau GmbH & Co. KG's Motions to Quash and to Set Aside the Clerks Entry of Default 4.	75.00/hr	307.50
review TRG publication, locate, save and review authorities re service .4 Revise and update insert re permissible service	400.00/hr	3,480.00

Gregor Lesnik

Page 143

	<u>Rate</u>	<u>Amount</u>
.1 Add to draft MPA in opposition to motion to quash		
3.0 Re-review declarations of Hickman, Seiler and West for inconsistencies and contradictions with filings and known facts		
.5 Read contracts and MOM; Prepare insert re Eisenmann duties from known contracts		
.5 Call with Azalea Hills Apartment manager re tenants and receipt of mail, memo to file		
.2 Add to draft declaration including explanation of exhibits and relevance		
4.0		
2/14/2019 Receive and review Certified Receipt re Branko Tomas signed by M. Dean Refused and Returned service packet re D2N.	400.00/hr	40.00
revise organization of draft MPA in opposition to motion to quash, review and revise text of MPA	400.00/hr	3,880.00
1.5 Review compiled exhibits and exhibit lists, revise exhibits, revise bookmarks, locate additional documents from our Rule 26 documents and from the internet; direct staff in revisions to compiled exhibits and to index of exhibits for declaration		
1.5 Add to draft declaration		
.9 Calls with ecf help re bookmarks		
.1 Assist in e-filing declaration and exhibits		
.1 Add to and complete MPA in opposition to motion to quash other than exhibit references		
2.0 Insert exhibit references to MPA in opposition to motion to quash		
1.5 Prepare table of contents and table of authorities		
1.0 Insert exhibit references to MPA in opposition to motion to set aside		
.4 Complete and save MPAs, convert to pdf, e-file		
.3 E-mails to co-counsel and to clients		
.2 Receive e-notice, download, save and review government Statement regarding motion to dismiss		
.2		
Completed Exhibit List for Declaration of William C. Dresser		465.00
3.5 Research entity names, prepared Declaration	75.00/hr	

Gregor Lesnik

Page 144

		<u>Rate</u>	<u>Amount</u>
	2.0 Assisted in preparing declaration .7		
2/14/2019	direct completion of exhibit list for declaration, review, revise .5 Review Eisenmann proposed Order .1 Compile 604 pages of exhibits for draft declaration in opposition to motions to quash and to vacate .5 Revise and proof draft declaration .5 Locate additional documents re Eisenmann entities profiles, corporate officers and directors, lists of members, affiliated entities, supervisory board, linked entities 2.0 Update declaration to identify relationship between foreign and US Eisenmann entities 1.0 Compile 635 pages of exhibits for final declaration .2 Inserts to declaration of final exhibit list .3 Complete to file declaration, complete to file exhibits .2 Complete MPA in opposition to motion to quash 1.3 complete MPA in opposition to motion to vacate / set aside 1.0 Organize to file oppositions to motions, including exhibits parts 1 and 2 .2 Receive confirmation of e-filing of declarations, exhibits, and MPA .1 E-mails to Walker firm and to clients .1	400.00/hr	2,920.00
2/15/2019	download and save e-mails .1 print filed pleadings and organize for delivery of courtesy chambers copy to court and delivery to court .6 (level 3) Print filed pleadings and organize for our files .3 (level 3)	400.00/hr 400.00/hr	40.00 280.00
2/16/2019	review e-mail from attorney Bernay .1	400.00/hr	40.00
2/18/2019	call with Stjepan Papes re service .2 E-mail to Stjepan, Gregor and Danijel	400.00/hr	360.00

Gregor Lesnik

Page 145

	<u>Rate</u>	<u>Amount</u>
.1 Wire funds		
.1 (no charge) e-mail to Papes		
.1 Prepare response to Bernay e-mail re release agreement		
.2 E-mail from Papes re Magna entities, internet search of addresses, save screen shots from google maps, e-mail to Papes		
.3		
2/18/2019 e-mail from Bernay and counsel; e-mail to counsel re bases for opposition to proposed motion to dismiss causes of action by Lesnik	400.00/hr	360.00
.2 E-mails with clients about service in Slovenia by both post and personal service		
.2 E-mail from Papes, review information re Magna entities, save social posts, google map information, internet available information		
.4 E-mail to Papes why serve Magna, d.o.o. at specified locations		
.1		
2/19/2019 calls and texts with Stjepan Papes, Gregor Lesnik and Danijel Travancic re service	400.00/hr	560.00
.4 Wire funds		
.1 (no charge) prepare for and conference call with attorneys Bernay, Murphy and Foran re their Rule 11 letter and settlement agreement, memo to file		
1.0		
Track Service Packets for Third Amended Complaint, print out status and update Service Spreadsheet	75.00/hr	112.50
1.5		
locate and save statements of information for foreign corporations		
.1	400.00/hr	360.00
Discuss with office staff locating and saving USPS tracking of delivery of waivers to all Slovenian and Croatian companies		
.1 Prepare for and call with Bernay and defense counsel re basis of Lesnik claims both other than as specified to be released, and for events after 2016		
.7		
2/20/2019 calls and texts with Stjepan Papes, Gregor Lesnik and Danijel Travancic re service	400.00/hr	40.00
.1		

Gregor Lesnik

Page 146

	<u>Rate</u>	<u>Amount</u>
2/22/2019 receive, download and save, and review, Eisenmann entities reply in support of motion to quash including Order and Judgment in patent case and further declaration of West; same for reply in support of Motion to Set Aside Default .2	400.00/hr	80.00
Receive and review Service package returned from LB Metal d.o.o., Mos Servis, and HRID	400.00/hr	40.00
receive Eisenmann reply in support of motion to quash, along with exhibits; save, print, review same .2	400.00/hr	160.00
Receive Eisenmann reply in support of motion to set aside, save, review .2		
2/24/2019 e-mails from Gregor, download, save and review service on We-Kr, translate proof of service .2	400.00/hr	80.00
e-mail from Papes re service in Croatia, and service in Slovenia .1	400.00/hr	240.00
receive and save POS on We-Kr, d.o.o. .1		
Receive and save receipt for service .1		
Receive, save and review proposal by Odvetnik Luka Divjak re services in Slovenia .1		
Organize documents re service and requests to serve, prepare file for same .2 (partially charged)		
2/25/2019 Translate document, email to Danijel 1.5	75.00/hr	112.50
e-mails from Papes, download, save and review original for service on We-Kr; e-mail from Gregor, discuss cleaning up translation to attach to Return of Summons Executed for filing .2	400.00/hr	200.00
Call with Papes .2		
Wire funds for Slovenian Odvetnik to review pleadings prior to service .1 (no charge)		
locate accident documents, convert to pdf, e-mail to Gregor .5		
locate visa payment for Regional Medical Hospital, save .1	400.00/hr	160.00
Translate POS on We-Kr, d.o.o.; save memo, save to file .2		
Organize to file POS returned on We-Kr, d.o.o. .1		

Gregor Lesnik

Page 147

	<u>Rate</u>	<u>Amount</u>
2/26/2019 review translation changes per Danijel .1 Discuss saving information of returned envelopes, and compare with prior envelopes not being returned .1	400.00/hr	80.00
Prepare for filing, We-Kr in Croation and English, efiled with US District Court, update spreadsheet .6	75.00/hr	45.00
receive proof of service delivered on LB Metal, d.o.o., Mos Servis, d.o.o., and HRID-Mont, d.o.o., save; update service list .2 Receive USPS registered mail confirmation of delivery to Ivan Vuzem, scan, save .1	400.00/hr	120.00
2/27/2019 Receive and review Third Amended Complaint packet re Ivan Vuzem returned	400.00/hr	40.00
3/1/2019 receive e-mail from We-Kr, save attachments, prepare reply e-mail in Croatian, e-mail to clients .5	400.00/hr	200.00
Receive and review Proof of Service re Vuzem USA	400.00/hr	40.00
e-mail from Milec, supervisor at We-Kr, save attached visas and wages documents, send reply e-mail to Milec, forward to clients for comment .3 E-mail from Papes re We-Kr worker Pongracic .1	400.00/hr	160.00
3/4/2019 review e-mails re Kaitlyn Murphy withdrawal as counsel .1 E-mail from Milec of We-Kr d.o.o., discuss with staff filed proof of service .1	400.00/hr	80.00
Scanned Certified Return Receipt re Branko Tomas and saved to server .1	75.00/hr	7.50
e-mail from Milec of We-Kr, d.o.o. .1 receive letter from CT Corporation re service .1 Review USPS proof of delivery of waiver to D2N .1	400.00/hr	120.00
3/5/2019 call Walker, call Ingo Brauer, call Emily Rand of CBSN .2 Receive applications to appear by phone .1	400.00/hr	200.00

Gregor Lesnik

Page 148

	<u>Rate</u>	<u>Amount</u>
Receive e-mail about application by attorney Murphy to withdraw as counsel for Eisenmann entities .1		
E-mail from Palmer re long hours publications in Bloomberg Law News .1		
3/6/2019 US ex rel Lesnik calls with attorney Bernay about his request to reschedule hearing, including being present on his conference call to courtroom deputy .2	400.00/hr	80.00
call with attorney Bernay regarding defendants request to continue hearing on motions to quash; schedule of CMC .2	400.00/hr	80.00
3/7/2019 e-mail from Ta to Judge Kohs department, e-mail to department .1	400.00/hr	40.00
e-mail from Bernay to courtroom deputy, e-mail to courtroom deputy to clarify what was discussed about scheduling; update calendar .2	400.00/hr	80.00
3/8/2019 save e-mail from Ta to court .1 Memo of activities to prepare for hearing on motion to dismiss .2	400.00/hr	120.00
3/10/2019 evaluate next activities for hearing on motion and for CMC .1	400.00/hr	40.00
3/11/2019 receive e-notice of, download, save and review withdrawal of Murphy and appearance of Holtzman for Eisenmann; research re new counsel .2 Save e-mails of past week by defense counsel to Judge Kohs Department .1 E-mail to Gregor and Stjepan regarding proofs of service .1 E-mail from Stjepan, download and save attachment .1 E-mail from Gregor, download and save attachment of certificates of service by post, sort each as to individual defendant, e-mail to Gregor .2 Receive notice vacating hearing on motion to dismiss, save .1 Begin to download proofs of services attached to Gregor Lesnik e-mails .5 Call from Stjepan .1 E-mail from and to Skip Walker re status .2	400.00/hr	640.00

Gregor Lesnik

Page 149

	<u>Rate</u>	<u>Amount</u>
3/11/2019 e-mail from Papes, receive, save, and print proofs of service		400.00
.1	400.00/hr	
E-mails to clients to forward and request servers to forward all proofs of service to file prior to CMC		
.1		
Receive 7 e-mails from Gregor, with multiple proofs of service by post and by mail; save pdf and jpeg and presentation digital copies; translate e-mail from Odvetnik Divjak; translate e-mail from Papes; translate e-mail from Gregor		
.5		
Update service status spreadsheet		
.1		
Receive e-notice of vacating hearing on motion to dismiss		
.1		
E-mail to and from attorney Walker		
.1		
3/12/2019 e-mail from and to counsel Walker		440.00
.1	400.00/hr	
Discuss with staff proofs of service on Slovenian persons		
.2		
E-mails from Gregor re service, partially save, discuss with staff saving documents for proof of service, organization of same, and need for translation		
.3		
E-mails with Gregor and Stjepan re service and billings, wire to Stjepan, e-mail to Stjepan and Gregor		
.5		
download and translate documents from client		150.00
2.	75.00/hr	
receive further e-mails with proofs of service, save		400.00
.1	400.00/hr	
Translate proofs from DVA FOKUS, save		
.3		
Organize digital copies of pages into full proofs, save		
.3		
E-mail from Papes re invoices for services; Locate information re wire transfers to date, wire funds for invoices for services, e-mail to clients summarizing payments		
.3		
3/13/2019 e-mail from Palmer, review hyperlinked article		40.00
.1	400.00/hr	
Working on identifying documents from client		112.50
1.5	75.00/hr	
receive and save and organize additional POS on D2N		40.00
.1	400.00/hr	

Gregor Lesnik

Page 150

	<u>Rate</u>	<u>Amount</u>
3/14/2019 Gather documents regarding service on ISM Vuzem USA, Inc and Vuzem USA, Inc., scanned, saved to server and prepared for filing .5 Organize filing .2	75.00/hr	52.50
locate and save prior filed Proofs of Service, print and save, add to service list .1 (partially charged) organize POS to file for Vuzem entities .2	400.00/hr	120.00
3/18/2019 Translating documents from client 4.0	75.00/hr	300.00
organize to file proofs of services with translations of D2N .5	400.00/hr	200.00
3/19/2019 Translating documents from client, email to danjil 2.0	75.00/hr	150.00
organize to prepare to e-file multiple proofs of service, and discuss same with staff .3 (partially charged)	400.00/hr	120.00
3/21/2019 receive e-notice of, download, save Order .1 Review Order on motions to dismiss, analyze ruling and analysis by Judge Koh 2. memo re reconsideration, certification for appeal, and research same, memos to file; begin shell of motion for reconsideration and ex parte application 1.2 begin draft of text of motion for reconsideration as to issues decided adversely to clients with reference to record 2.0 E-mail to clients .1 E-mail to Skip Walker .1 Call with Matt Galin, e-mail from and to Galin .2 Research service in Slovenia, and Slovenian statutes including for effective service; save statutes 1.4 E-mail to Odvetnik Divjak re effective service .2 Call with and e-mail to Danijel Travancic re translations of proofs of service .2 Call with Danijel re inquiries by Stjepan and Gregor and Order on motions to	400.00/hr	3,080.00

Gregor Lesnik

Page 151

	<u>Rate</u>	<u>Amount</u>
dismiss .2		
3/21/2019 receive Order on motions to dismiss, save, review .2	400.00/hr	2,200.00
Prepare detailed e-mail to clients re Order, and differences between allegations and what is stated in the Order, potential remedies 1.2		
E-mail to Walker .1		
E-mail to and from Galin re RICO portions of Order .1		
Research authorities re materiality .1		
Research statutes under Slovenian law re law and procedure; visas, reciprocity; locate English and Slovenian versions, review same 3.5		
Prepare letter for e-mail to Odvetnik Divjak; e-mail to Divjak .2		
Discuss need for bi-lingual Danijel to review translations .1		
3/22/2019 e-mail from Odvetnik Divjak, locate Slovenian Code of Civil Procedure, read applicable portions in English and Slovenian, save texts of statutes, e-mail to Divjak .4	400.00/hr	1,000.00
Skim review booklet of original proofs of service; Text to Danijel .1		
Call with Matt Galin re Order as it affects RICO cause of action .5		
e-mail from and to Peter Koenig .2		
Add to draft text of motion .5		
Scan, organize and digitally name all person and all post proofs of service from Odvitnik Divjak .7		
E-mail to Danijel .1		
e-mail from Divjak .1	400.00/hr	920.00
Receive mailed copies of proofs of service, direct scan of each .2		
Call with Galin re reconsideration and appeal of issues on ruling re RICO, memo to file .2		
E-mails from and to Walker based on courts Order .2		
Review and organize scanned proofs into complete individual proofs of service in person, and by post, for each defendant 1.0		

Gregor Lesnik

Page 152

	<u>Rate</u>	<u>Amount</u>
Call to, e-mail to, and conference with Danijel Travancic re translations .6		
3/23/2019 evaluate response based on current case status .5	400.00/hr	200.00
3/24/2019 prepare to do list for motion .5	400.00/hr	200.00
review local rules, review FRCP, locate similar case and court motions for reconsideration 1.5	400.00/hr	1,400.00
Prepare draft administrative motion for leave to file motion for reconsideration 1.0		
Prepare draft motion for reconsideration cribbing from prior analysis 1.0		
3/25/2019 Translating documents 2.0	75.00/hr	150.00
e-mails from and to Gregor and Stjepan re Order on motion to dismiss .2	400.00/hr	2,120.00
E-mail from and to Process Net re service .1		
Prepare draft Administrative Motion by Plaintiffs and Relators for Leave to File Motion for Reconsideration re Motion to Dismiss, research local rules, revise based on draft Motion for Reconsideration 1.0		
Research local rules, FRCP 59, FRCP 60, Ninth Circuit analysis, Prepare draft motion for reconsideration; prepare draft inserts for applicable facts 4.0		
prepare insert re allegations of 3AC about who employer is and affect on statutory liability under California law for employers .5	400.00/hr	400.00
add to draft administrative motion for leave to file motion for reconsideration, and draft motion for reconsideration .5		
3/26/2019 Translating documents 3.0	75.00/hr	225.00
research motions for reconsideration, RICO Enterprise, add to draft motion for reconsideration .6	400.00/hr	400.00
discuss with staff translations of proofs of service and supporting statements; discuss completing to e-file proofs of service .2		
Review e-mail from attorney Divjak; Review and save all and portions of Slovenian Code of Civil Procedure and translation; assist to save for filing .2		

Gregor Lesnik

Page 153

	<u>Rate</u>	<u>Amount</u>
3/26/2019 research certification for appeal, record on appeal .4 Organize and assist staff to organize proofs of service .5 Research California Labor Code decisions, research FCA decision cited in Order, revise draft Motion for Reconsideration 1.0	400.00/hr	760.00
3/27/2019 Translate remaining documents and organize for meeting with Danijel 3.0 Gather all personal and postal serve documents and prepare for filing 5.0	75.00/hr	600.00
discuss with staff translations, review drafts to file proofs of services including of Vuzem entities .2 Save internet research of decisions re motions for reconsideration; add to Motion for Reconsideration, add to Administrative Motion for Leave to File Motion for Reconsideration 1.0 E-mail from Papes of facts contrary to judges order; save attachment .1 Call with Danijel Travancic .1	400.00/hr	560.00
review proofs to file .2 Research ND California decisions by Judge Kho on motions for reconsideration; add to motion for reconsideration .5 Add to administrative motion for leave to file .2 E-mail from client re facts in Order, analysis of same .1 Save statement, translate, review same .2 Locate and save official English translation of Slovenian Code of Civil Procedure .2 Excerpt relevant parts for service .2 Save to file Slovenian statute, and English translation, to file with request for default .2 E-mail from and to Foran re request for extension of time to file responsive pleading .1	400.00/hr	760.00
3/28/2019 Make corrections to translations and prepared for filing, filed personal and postal proofs of service 6.0	75.00/hr	450.00

Gregor Lesnik

Page 154

	<u>Rate</u>	<u>Amount</u>
3/28/2019 Receive and review letter to Danijel, Gregor and Bill		40.00
	400.00/hr	
discuss preparing proofs of service		240.00
.1 (partially charged)	400.00/hr	
Prepare detailed to do memo for completing and filing proofs of service, discussion with staff; assist with initial e-filings		
.5		
E-mail from Bernay re extension of time, e-mail to Bernay re discovery		
.1		
discuss and assist with translations of proofs of services		360.00
.3	400.00/hr	
Memo re documents to organize and to save, and then to organize each for proofs of service		
.3		
Review proofs prior to e-filing		
.1		
Review proofs as compared to checklist		
.1		
E-mail from and to Bernay re request for extension of time to file responsive pleading and regarding discovery		
.1		
3/29/2019 review e-filed proofs of service		80.00
.1	400.00/hr	
E-mail from and to Stjepan re Mos Servis worker Franc Kriznik		
.1		
discuss with and assist with download, save and print all filed proofs of service including all attachments; review same		80.00
.2	400.00/hr	
3/30/2019 e-mails with counsel for Eisenmann re extension of time to file Answer		40.00
.1	400.00/hr	
e-mails from and to Bernay re extensions of time		40.00
.1	400.00/hr	
3/31/2019 assembled filed docs and filed		15.00
.2	75.00/hr	
4/1/2019 e-mails with counsel, receive, download, review, execute, scan and return stipulation to extend time		120.00
.3	400.00/hr	
e-mails with counsel, approve stipulation re extensions of time, review e-filed applications		40.00
.1	400.00/hr	

Gregor Lesnik

Page 155

	<u>Rate</u>	<u>Amount</u>
4/2/2019 receive and save Order denying stipulation to extend time to answer complaint, e-mail from Bernay .2	400.00/hr	80.00
receive Order denying stipulation to extend time .1	400.00/hr	40.00
4/3/2019 e-mail to attorney Bernay .1	400.00/hr	40.00
e-mails with attorney Bernay; approve revised stipulation stating reasons for request for extension, receive filed revised stipulation, receive Order granting revised stipulation .3	400.00/hr	120.00
4/6/2019 evaluate administrative motion to serve Magna, doo by alternative means if service is not considered sufficient .2 prepare for conference with defense counsel re discovery .5	400.00/hr	280.00
4/8/2019 Receive and review letter from US Metal doo	400.00/hr	40.00
e-mails to and from, prepare for conference with, and conference call with defense counsel re status, discovery, disclosure, defaults and anticipated motions to reconsider and to vacate defaults, memo to file 1.0	400.00/hr	400.00
prepare for teleconference .5 E-mails with defense counsel about rescheduling .1 Conference call re discovery and CMC 1.0	400.00/hr	640.00
4/10/2019 Call from attorney Hershon re Mos Servis, memo to file, entered contact information in file and draft Proof of Service .3	75.00/hr	22.50
calls from opposing counsel, memos to file .2 Update service spreadsheet 1.0	75.00/hr	157.50
memo of call from Lawrence Hershon re potential representation of Mos Servis, d.o.o.; call with Hershon, memo to file; e-mail from Hershon .3 E-mail to clients .1 discuss with staff filing all US ex Rel Lesnik Pleadings .1	400.00/hr	2,640.00

Gregor Lesnik

Page 156

	<u>Rate</u>	<u>Amount</u>
Prepare revised draft POS by mail for discovery		
.1		
Organize exhibits for motion for reconsideration, including for Request for Judicial Notice		
1.4		
Prepare request for judicial notice		
.5		
Call with Alex Holtzman re filing Joint CMC Statement		
.1		
Complete administrative motion for leave to file motion for reconsideration		
1.5		
Prepare proposed Orders on motion for leave to file motion for reconsideration, save		
.3		
Revise motion for reconsideration		
.2		
Review and revise Joint CMC Statement, e-mails with counsel, approve to file		
1.0		
Revise and complete to file Administrative Motion, proposed Motion for Reconsideration, proposed Request for Judicial Notice, proposed Order		
1.0		
4/11/2019 Receive confirmation of e-filing, save, print		480.00
.1	400.00/hr	
E-mail to clients		
.1		
E-mail to Walker		
.1		
E-mail to Palmer		
.1		
E-mail to Kealey		
.1		
Prepare memo re claims against Mos		
.4		
Receive Order denying administrative motion for leave to file motion for reconsideration		
.1		
E-mail to Walker		
.1		
E-mail from and to Palmer		
.1		
4/15/2019 receive and save letter on behalf of LB Metal, d.o.o.		160.00
.1	400.00/hr	
Receive Eisenmann Answer to Complaint, save, review including admissions of labor subcontractors that it had contracts with		
.3		

Gregor Lesnik

Page 157

	<u>Rate</u>	<u>Amount</u>
4/16/2019 Call from Russ Hanlon, memo to file		
.1	75.00/hr	37.50
Assist in preparing Request to Clerk to Enter Default for Defendants		
.4		
research 9th Circuit decision that mutual release is not a bar		1,120.00
.1	400.00/hr	
Call with appellate counsel Russell Hanlon re timing of appeal in federal action		
.1		
Locate, save and partial review portions of 9th Circuit Appellate Jurisdiction publication		
.3		
Prepare sample / shell for requests for entry of default, prepare sample / shell form for declaration supporting default		
1.0		
E-mail from Koenig, prepare for and call with Peter Koenig re status and upcoming CMC, save memo		
.3		
Prepare request for entry of default for one defendant, discuss with staff information to replace for other defendants, review and revise drafts		
1.0		
4/17/2019 Assist in preparing Request to Clerk to Enter Default for remaining Defendants in Slovenia, prepared for international mailing, personally went to Post Office	75.00/hr	525.00
7.		
prepare and complete proofs of service for filing, and requests and supporting declarations for filing requests for entry of default; review before filing; compare with spreadsheet, update spreadsheet	400.00/hr	2,880.00
3.5		
prepare for CMC, meeting with Peter Koenig, attend further CMC, further discussion with Koenig		
3.0		
Download and save e-filed proofs of service, requests for entries of default, declarations in support of requests for entries of default; print		
.4		
Receive e-minutes from CMC		
.1		
Receive CMC Order, amended Order, and second amended Order; save each, review; calendaring		
.2		
Calls with and e-mail with FedArb; wire further payment		
.1 (no charge)		
4/18/2019 Filed pleadings		22.50
.3	75.00/hr	

Gregor Lesnik

Page 158

	<u>Rate</u>	<u>Amount</u>
4/18/2019 receive Tesla Answer including cross-claim, save, print .1 E-mail to clients and to Walker firm re status of case 1.0	400.00/hr	440.00
4/22/2019 update spreadsheet .9 Organize Service files 3.	75.00/hr	292.50
save and review e-mails of past week .1	400.00/hr	40.00
4/23/2019 Gather documents and organize file 3.	75.00/hr	7.50
direct scan of envelopes for waivers of service .1	400.00/hr	40.00
4/24/2019 Gather, copy and organize documents 4.0	75.00/hr	300.00
4/25/2019 Worked on file organization, opened new folders for service and defaults 3.0	75.00/hr	225.00
4/29/2019 Translate documents 1. File organizing .5	75.00/hr	112.50
Receive and review letter from Papes re case and enclosing medical records	400.00/hr	40.00
e-mail from Papes, memo from Papes; receive employment contract with HRID-Mont for assigned annexed former ISM Vuzem doo worker Goran Rebic, save .2 E-mails from Papes, save doctor records and reports .2 Save proofs of service and individual pages for service on Robert Vuzem .1	400.00/hr	200.00
5/1/2019 Organizing file, translate the rest of documents 1.	75.00/hr	75.00
Receive and review letter from client now translated	400.00/hr	40.00
5/6/2019 e-mail with Stjepan re prior good health, call with Stjepan Papes; e-mail from Papes with health records, download, save, review .4	400.00/hr	160.00

Gregor Lesnik

Page 159

	<u>Rate</u>	<u>Amount</u>
5/11/2019 e-mails from and to Judge Matz .1	400.00/hr	40.00
5/26/2019 research Ninth Circuit decisions denying motions to vacate defaults .1	400.00/hr	40.00
5/30/2019 call with Bernay re Judge Matz and potential further mediation .1 Call with Process Net re service via Hague Convention .1 E-mail with Jim Kealey re status .1	400.00/hr	120.00
5/31/2019 call with Process Net re fees for lesser prices .1 Call with Link Translations about translation into Polish, e-mail from Link Translations .1	400.00/hr	80.00
6/4/2019 locate, read, and memo re changes to Labor Code section 218.7 of joint contractor and subcontractor responsibility for wages .2	400.00/hr	80.00
6/5/2019 memo to order copy of transcript of Case Management Conference .1	400.00/hr	40.00
6/8/2019 memo to file re translation into Polish, request service and pay for service .2	400.00/hr	80.00
6/9/2019 call with Stjepan Papes about status of claims and further activities and scheduling same; prepare followup e-mail 1.0	400.00/hr	400.00
6/19/2019 locate information re pi claims against Tesla, settlements of claims, inspections for Cal OSHA, injury work rates, published resignation letter re unsafe work conditions, save digital copies of information .3 E-mails with attorney Thomas Germ re claims of his client Robert Hernaus .1 Call with attorney Bernay re settlement demand and basis for demand, need for discovery information if settle with Eisenmann and Tesla, authority issues for German entities, memo to file .5	400.00/hr	360.00
7/3/2019 e-mails from and to Gregor re status of exchange only by us of settlement proposal .1	400.00/hr	40.00
7/7/2019 memo re translation into Polish, request service and pay for service .1	400.00/hr	40.00

Gregor Lesnik

Page 160

	<u>Rate</u>	<u>Amount</u>
7/8/2019 review file status, memo re translation into Polish, /request service /pay for service .1	400.00/hr	40.00
7/11/2019 review status of translation into Polish, e-mail to Link Translations	400.00/hr	40.00
7/13/2019 receive e-mail from Link Translations, save translation into Polish .2 Begin search for entities to serve in Poland, e-mails with Process Net .2	400.00/hr	160.00
7/15/2019 e-mails with Process Net .2	400.00/hr	80.00
7/16/2019 Translated Issued Summons and epro Order from English to Polish 1.0	75.00/hr	75.00
machine translate into Polish Orders amending hearing .2	400.00/hr	80.00
7/17/2019 Receive and review letter addressed to Mr. Papes from Homeland Security letter addressed to Mr. Papes from US Department of State	400.00/hr	40.00
e-mail from Palmer .1 E-mail from Process Net .1	400.00/hr	80.00
7/18/2019 Translated to Polish Proof of Service .5	75.00/hr	37.50
e-mail from Link Translation that transcript to be shipped .1 Machine translate POS for service in Poland .2 Receive, save, complete, and scan USM-94s for service in Poland .3 E-mails with Process Net .1	400.00/hr	280.00
7/22/2019 Prepared letter for invoice enclosing payment .1	75.00/hr	7.50
7/23/2019 call from Steven Weisman of Lexshares .1 Message to attorney Bernay .1	400.00/hr	80.00
call from Steven Weisman of Lexshares .2	400.00/hr	80.00

Gregor Lesnik

Page 161

		<u>Rate</u>	<u>Amount</u>
7/23/2019	memo to order copy of transcript of Case Management Conference .1	400.00/hr	40.00
7/24/2019	e-mail from Papes, receive Homeland Security and US Dept of State letters to Papes re redress inquiry, save .1 Research Polands Act on the Organisation of Ordinary Courts, research Code 39, extract law on default of appearance, service by bailiff .5 Research Polands Unified Code of Civil Procedure, Procedure re service, Constitutional Tribune Act, save relevant text 1.2 E-mail to Stjepan .1 E-mail to Bernay re CMC and re settlement proposal .1 E-mail with Process Net .1 Memo to insert into draft CMC Statement request to terminate stay to allow for entries of default [including against Mos Servis, d.o.o. and We-Kr, d.o.o. currently in draft] .2	400.00/hr	920.00
7/25/2019	<div style="background-color: black; height: 40px; width: 100%;"></div>		225.00
	e-mail to Koenig status of case and of settlement discussions .3 Forward e-mail with explanation to clients .1 E-mail from and to Papes re letter from DHS .1 Save text of translation of Poland Code of Procedure, and Code portions re service .3	400.00/hr	320.00
7/29/2019	receive notice about Eisenmann SE bankruptcy filing, conduct internet investigation, search for filed pleadings, save articles .5 Call to Teslas counsel .1	400.00/hr	240.00
7/30/2019	conduct further investigation re bankruptcy reorganization in Stuttgart, locate and save articles .4 Research recognizing foreign bankruptcies in US courts .1 Review discovery previously propounded to Eisenmann Corporation .1 Receive e-mail and proposed Joint CMC Statement .2 Research subject matter jurisdiction, save article	400.00/hr	880.00

Gregor Lesnik

Page 162

	<u>Rate</u>	<u>Amount</u>
.1 Locate Public Act version of TVPA of 2000, save		
.1 Call with Ingo Brauer		
.1 Research HCCH authority, cooperation under Polish law of other court authority		
.2 E-mail to Polands HCCH Authority re service issues		
.1 E-mail to Szanowny Panie re Polish services		
.1 Attempted e-mail to (now former) Asst USAG Kim Friday, receive auto reply		
.1 Locate Eisenmann press release re insolvency, save		
.1 Locate additional internet articles		
.1 Call USAG SF office, forward e-mail to Asst USAG Lo and Winslow		
.1 review and revise Joint CMC Statement		
.2 E-mails with counsel		
.1		
7/31/2019 review and revise Joint CMC Statement		240.00
.2 E-mails with counsel	400.00/hr	
.1 Download and save filed CMC Statement		
.1 Research Cal Supremes decision supporting class certification even when all class members could not be identified, save Opinion		
.2 further revisions in track changes to draft Joint Case Management Conference Statement, add request to terminate stay to allow for entries of default, multiple e-mails with counsel with changes, approve final version for filing	400.00/hr	1,000.00
2.5		
8/1/2019 e-mails with Process Net re service		120.00
.1 E-mail to Walker firm	400.00/hr	
.1 Receive substitution of Michelle Lo for former AUSA Kimberly Friday		
.1		
8/2/2019 receive Order to reset hearings, save		120.00
.1 e-mail to Walker firm, forward to clients with explanation	400.00/hr	
.1		

Gregor Lesnik

Page 163

		<u>Rate</u>	<u>Amount</u>
	receive Order to identify defendants, save .1		
8/5/2019	Review request for service abroad form under Hague Convention .1 Locate Chief Specialist - Judge for international service .1 Locate article re Hague Convention, review, save .2 E-mail from Poland HCCH Authority .1 Prepare list of remaining defendants .1 Prepare draft of report to identify remaining defendants 1.0 E-mail to Process Net .1 meet with Ingo Brauer .5	400.00/hr	920.00
	prepare for and meeting with Ingo Brauer 1.0	400.00/hr	400.00
8/7/2019	review file status, memo re FOIA; visa for Stjepan; prepare all requests to enter defaults; obtain status on service in Poland .2	400.00/hr	80.00
8/12/2019	update discovery spreadsheet .5	75.00/hr	37.50
8/13/2019	Worked on Information identifying remaining defendants 1.5	75.00/hr	112.50
8/14/2019	research petitions (2) for review granted in Cal Supremes re California minimum wages in hiring unlicensed independent contractor .1 Research petition for review granted re minimum wage law applied to out of state employer who pays episodically .1 Research petition for review granted re service by Hague Convention and motion to set aside judgment .1 Research petition for review granted re Labor Code 226 applies to out of state employer .1 E-mails from and to Stjepan about concerns .3	400.00/hr	280.00
8/15/2019	research re alleged breach of confidentiality agreements .2	400.00/hr	80.00

Gregor Lesnik

Page 164

	<u>Rate</u>	<u>Amount</u>
8/16/2019 research service abroad, Croatian immunity, European e-Justice portal re service .6 complete to file identification of remaining defendants .2 review file re file identification of remaining defendants .1	400.00/hr 400.00/hr	320.00 40.00
8/21/2019 locate Kimberly Friday information including speaker at forums, identify topics from forum, locate review articles regarding Granston memo re FCA cases, locate memo, save, read and analyze affect on our case; Research 9th Circuit materiality decision; locate and review Brand memo .5	400.00/hr	200.00
8/22/2019 research local news about immigration scam, locate and save indictment .1 Receive Order to serve defendants in next 13 days .1 Call to Process Net .1	400.00/hr	120.00
8/26/2019 e-mail from Process Net .1 Receive declaration of Nelson Tucker .1 Call to alternative Process Service Network, e-mail to entity .2	400.00/hr	160.00
8/28/2019 Receive and review Declaration of Nelson Tucker re service on RIMSA PUS SP, ZOO, Enterprise MDM Poland SP, Zoo, and MDM Polska SP, Zoo.	400.00/hr	40.00
8/29/2019 Scanned Declaration of Nelson Tucker re service on RIMSA PUS SP, ZOO, Enterprise MDM Poland SP, Zoo, and MDM Polska SP, Zoo. made searchable and saved to server .1	75.00/hr	7.50
8/30/2019 research re taxing costs .1 prepare draft service directions, complete further Requests for Service Abroad; e-mails and calls with Process Service Network; locate and send issued summons translated 1.0 Prepare draft of administrative mtn for extension of time to complete Service of Process 1.0 Research, locate authorities, and save decisions re dismissals for lack of prosecution, permitted service and not allow service by mail, Poland services and Eisenmann company decisions re forum non conveniens 1.3 E-mail with Process Server One .1	400.00/hr	1,520.00


Gregor Lesnik

Page 165

	<u>Rate</u>	<u>Amount</u>
Prepare revised administrative motion to extend time to serve .3		
9/2/2019 locate exhibits for declaration of payments, translations, quotes for service, and invoices for service for declaration .4	400.00/hr	520.00
Confirm payment records .1		
Prepare proposed Order .1		
Prepare proof of service .1		
Organize to file Administrative Motion, including declaration and exhibits .3		
Receive e-filed Administrative Motion and proposed Order .1		
E-mail from Process Server One .1		
E-mail confirmation of approval of increased service fees .1		
9/3/2019 call with and e-mails with Process Server One re expedited service and potential completion dates .2	400.00/hr	80.00
9/4/2019 Personally delivered Administrative Motion by Plaintiffs and Relators for Order to Extend Time for Service of Process (N.D. California Civil Local Rule 7-9) [including Declaration]; and proposed Order to Judge Koh Chambers .4 (level 3)	75.00/hr	30.00
receive proposed revised declaration of Tucker .1	400.00/hr	360.00
Discuss with Reynolds and prepare proposed declaration re service and time to complete service; e-mail to Process Service Network .5		
E-mails with Tuckers staff, receive signed declaration .1		
E-file, and receive confirmation of filing, Tucker declaration .1		
E-mail to counsel proposing stipulation .1		
9/5/2019 Personally delivered Declaration of Nelson Tucker to Judges Chambers .4	75.00/hr	30.00
receive Reynolds declaration, save, e-file, receive confirmation of e-filing .2	400.00/hr	280.00
E-mail to Judge Koh .1		
Issue payment to Process Server One .1		
Receive notification of, and save letter by Senator Grassley to AG Barr about		

Gregor Lesnik

Page 166

		<u>Rate</u>	<u>Amount</u>
	implementation of Granston Memorandum as contrary to purpose of FCA; review same .2 E-mails with Palmer .1		
9/5/2019	review status of filing known proofs of service of unserved defendants per Order of 8/22/2019 .1	400.00/hr	40.00
9/10/2019	Receive and review email from Process Service Network re revised Declaration of Nelson Tucker	400.00/hr	40.00
	e-mails to and from Process Server One about status .1 Receive Order denying motion to extend time to serve .1	400.00/hr	80.00
9/18/2019	call with Jim Kealey .3	400.00/hr	120.00
			40.00
9/20/2019	prepare draft administrative motion for reconsideration of Orders re service 1.0	400.00/hr	400.00
9/22/2019	prepare draft declaration supporting administrative motion .5	400.00/hr	200.00
9/23/2019	locate exhibits re limits on WCD including re surgery to show due diligence, save as exhibits, save further payment records re translations and service requests, revise and add to declaration; save Order and prior declarations; include references to declaration, exhibits and ECF filings; revise and complete Administrative Motion for Leave to Reconsider, complete Declaration; compile exhibits; prepare to e-file; prepare proof of service, prepare proposed Order; e-file motion for reconsideration 6.0	400.00/hr	200.00
	review file for motion for reconsideration .1	400.00/hr	40.00
9/24/2019	download efiled documents, Prepared Proof of Service, and personally delivered to court .6	75.00/hr	45.00
9/30/2019	Prepared letter enclosing payment .1	75.00/hr	7.50

Gregor Lesnik

Page 167

	<u>Rate</u>	<u>Amount</u>
9/30/2019 e-mails and calls with CSR Shortridge, letter to Lee-Anne Shortridge .2 Receive Order denying motion for leave to file motion for reconsideration .1 E-mail from Papes re jobs for companies in US through Gregurec Ltd, identification of workers and companies, e-mail to Papes .1	400.00/hr	160.00
10/20/2019 e-mail to clients re upcoming CMC and anticipated Order to set scheduling for all events .3 E-mail from and to Danijel .1 E-mail to Koenig of Walker firm about status and litigation plan going forward .4	400.00/hr	320.00
10/21/2019 calls with clients, e-mail with clients, to discuss plan in light of developments and authority for trial, litigation and settlement .5 Call with Aaron Bernay re German entities, status .1 E-mail to Peter Koenig .1	400.00/hr	280.00
10/22/2019 Prepare attachment for 1.0	75.00/hr	75.00
call to Aaron Bernay .1 E-mails with counsel about revisions to Joint CMC Statement .1 E-mails from and to Stjepan to clarify requests for authority .1	400.00/hr	120.00
10/23/2019 Gather all Proofs of Service, Request for Default, Notice of Entries, and create spreadsheet 3.5	75.00/hr	262.50
complete approval for updated Joint Case Management Statement .2 Receive filed CMC Statement .1 Forward to clients .1 E-mails re related entities; save memo; save news articles; translate, evaluate as applied to claims against all entities as related and conspiring .3	400.00/hr	280.00
10/24/2019 call with Peter Koenig .2	400.00/hr	80.00

Gregor Lesnik

Page 168

		<u>Rate</u>	<u>Amount</u>
10/28/2019	Prepared complete list of all defendants who have been served 3.	400.00/hr	1,200.00
	review status of defaults, prepare updated draft request to enter default against We-Kr, d.o.o., with updated dates and ECF references and with corresponding declaration 1.0	400.00/hr	440.00
	E-mail from Papes concurrence with litigation plan .1		
10/29/2019	Update service spreadsheet, Gather pleadings re ISM Vusem USA, Vuzem USA, Mos Servis, and We-Kr, prepared draft Request for Default and Declarations for all 6.0	75.00/hr	450.00
	review and update with staff drafts for entry of default against Mos, Vuzem USA, and ISM Vuzem USA, Inc. .4	400.00/hr	160.00
10/30/2019	Worked on finalizing Default pleadings 1.0	75.00/hr	150.00
	Organize pleadings and files 1.0		
	review and update with staff drafts of declarations supporting defaults against Mos, d.o.o., Vuzem USA, Inc. and ISM Vuzem USA, Inc. .4	400.00/hr	1,280.00
	prepare for and attend further CMC 2.5		
	Calendar all dates set by Judge Koh .2		
	E-mail from and to attorney Wrebel .1		
10/31/2019	Receive and review letter from Jill Eggleston, Director of FOIA Operations re request for criminal allegations against Sistemas Globales SA	400.00/hr	40.00
	Calendared all up coming court hearings to 2021, scheduled but not heard, due dates for pleading responses, organized documents, pleadings, attorney notes, correspondence 3.	75.00/hr	232.50
	Call from attorney Hershon, memo to file .1		
	receive and save CMC Order .1	400.00/hr	480.00
	Receive notice of appearance by new defense counsel .1		
	Receive transcript order .1		
	evaluate last day to file Dismissals; calendar		

Gregor Lesnik

Page 169

	<u>Rate</u>	<u>Amount</u>
.1 E-mail to Lawrence Hershon who had contacted WCD about Mos Servis, d.o.o.		
.1 Call to Ingo Brauer		
.1 (no charge) e-mails to clients about status		
.1 Prepare dismissals of Magna, Intl, and of Keystone Automotive and Phoenix Mechanical; e-file		
.3 Phone messages to and from Hershon		
.1 Locate and scan return receipts of mailing disclosures to USAG offices		
.1 E-mail to Wrebel		
.1		
11/1/2019 download, save and review Eisenmann entities motion to quash, including exhibits	400.00/hr	1,160.00
.5 Locate, save and review Brockmeyer, Chung, Cosper and Falcov decisions, prepare memos re each		
.9 Begin draft opposition		
.4 E-mail to Koenig re status		
.2 E-mail to clients		
.1 E-mail from and to Judge DeMarchi and counsel; calendar		
.1 Review spreadsheet re service and defaults, Locate and organize for filing POS by mail on Mos Servis, d.o.o.		
.2 Call from Lawrence Hershon; e-mail to Hershon confirming he does not represent MOS Servis, d.o.o. and was directed not to appear		
.1 E-mail from defense counsel to Judge DeMarchi		
.1 Receive conference call notice; update calendar		
.1 Review e-mail from Stjepan, translate, e-mail to Stjepan		
.2		
11/4/2019 Worked on Request for entry of Default and declaration attachments with exhibits, efiled all, filed pleadings with copies in defendant folders	75.00/hr	375.00
5.0		
complete to file requests to enter default		1,600.00
2.0 e-mail from Stjepan about companies in US	400.00/hr	

Gregor Lesnik

Page 170

	<u>Rate</u>	<u>Amount</u>
.1 save screen shots, review, check social media posts		
.1 Review all ECF filings of requests for dismissals, list in order filed, save text of dismissals, complete memo		
1.0 Prepare and complete to file list of all defendants who have been served including Tesla and Eisenmann Entities		
.5 confirm e-filing of Requests to Enter Defaults		
.1 Locate and scan business cards from 2016 interview by USAGs office		
.1 E-mail to Koenig		
.1		
11/8/2019 receive, download and save all entered defaults; print, update service list		80.00
.2	400.00/hr	
11/12/2019 e-mail from Judge DeMarchis chambers, update calendar		160.00
.1	400.00/hr	
Prepare outline of argument on motions to quash		
.3		
11/13/2019 research cited decisions		1,200.00
.3	400.00/hr	
Prepare draft MPA in opposition to motions to quash		
2.5		
E-mail to ECCHR re Stuttgart District Court filings		
.1		
E-mail to Linda Chiem		
.1		
11/14/2019 US ex rel Lesnik: added footer to exhibits, and combined exhibits w WCD Decl in Oppo to Defts Renewed Mtn to Quash		18.75
time: .25	75.00/hr	
Open account with Superior Court, County of Los Angeles for court records, search for pleadings re Eisenmann Corp, print out all pleadings		30.00
	75.00/hr	
Locate and save Eisenmann Corporation entity lawsuit information and pleadings as patent lawsuit plaintiff, as Relator, as plaintiff including declarations by Mark West		3,360.00
	400.00/hr	
1.5		
Prepare inserts for MPA		
.4		
Add substantially to Declaration		
2.0		
Organize exhibits for attachment to declaration		
.5		
Make multiple revisions to and proof MPA and Declaration, complete to e-file MPA and Declaration in opposition to renewed motion by Eisenmann entities		

Gregor Lesnik

Page 171

	<u>Rate</u>	<u>Amount</u>
to quash service 4.0		
11/15/2019 download, save and print e-filed opposition .1 Save case information from Eisenmann case filed in Los Angeles County .1	400.00/hr	80.00
11/17/2019 review discovery, evaluate timing of responses due, review CMC Order; compare prior served copies of discovery to issues in case; prepare draft attachment to subpoenas to Tesla and to Eisenmann, begin draft letter to counsel, contact subpoena service 2.0	400.00/hr	800.00
11/18/2019 subpoenas .2	75.00/hr	15.00
complete letter and prepare e-mail of letter to counsel re discovery and pleadings .2 Complete subpoenas for business records to Eisenmann Corp and to Tesla .7	400.00/hr	360.00
11/19/2019 Receive and review completed subpoenas from Titan	400.00/hr	40.00
calls with subpoena services, complete order form for subpoenas, attach subpoena information, fax and e-mail, scan copies .4 E-mail to Koenig .1 Prepare for and attend telephone call with Magistrate Judge Virginia K DeMarch and all counsel re settlement conference; memo to file; calendar 1.0 Review Eisenmann Cross-claim, review notes from client, review affirmative defenses, Prepare Gregor Lesnik Answer to Eisenmann Corporation counter-claim 2.0 Review Tesla Counter-claim, prepare Answer to Tesla counter-claim 2.0	400.00/hr	2,200.00
11/20/2019 save e-filed Answers .1 Receive e-notice setting settlement conference .1 E-mail to clients .2 E-mails and call with Stjepan about remotely attending settlement conference .1	400.00/hr	200.00

Gregor Lesnik

Page 172

	<u>Rate</u>	<u>Amount</u>
11/22/2019 e-mails with Stjepan, save attachments .2 E-mail from and to Foran about service, stay, and due date for discovery responses .2	400.00/hr	160.00
11/23/2019 prepare second service of requests to produce, prepare requests to produce to Eisenmann SE, prepare requests to produce to Eisenmann Corporation as revised, prepare Second Set of requests to produce to Eisenmann Corporation, prepare proofs of service 3.5 Prepare A/R statement of costs, scan .3 (no charge)	400.00/hr	1,400.00
11/25/2019 Receive and review subpoenas regarding Eisenmann Corp and Telsa, Inc. from Titan Legal Services	400.00/hr	40.00
11/26/2019 e-mail from and to attorneys Bernay and Ta for Eisenmann, attach subpoenas .1	400.00/hr	40.00
11/29/2019 Receive and review letter from California Secretary of State	400.00/hr	40.00
attempted e-mail to Emily Rand, search for current status of work and location .1	400.00/hr	40.00
12/3/2019 e-mail to client re costs and settlement issues .2 (no charge) e-mails with Stjepan, Danijel and Gregor .2	400.00/hr	80.00
12/6/2019 Receive and review Teslas Objections and Responses to Subpoena to Produce Documents Information or Objects	400.00/hr	40.00
12/9/2019 Scanned Teslas Objections and Responses to Subpoena to Produce Documents Information or Objects, made searchable and saved to server .1	75.00/hr	7.50
review calendar re l/d for Tesla, and l/d for Eisenmann Corp, to respond to subpoenas for production by custodians of records .1	400.00/hr	40.00
12/10/2019 Receive and review Eisenmann Corp s Objections to November 21, 2019 Subpoena to Produce Documents, Information, or Objects	400.00/hr	40.00
12/12/2019 receive, scan, and make OCR searchable, Eisenmann objections to subpoena; review same .2	400.00/hr	80.00

Gregor Lesnik

Page 173

	<u>Rate</u>	<u>Amount</u>
12/13/2019 e-mails with Stjepan about laptop and appearance at STC .1	400.00/hr	40.00
12/16/2019 Receive and review Eisenmann's First set of Interrogatories, Request for Production, and Request for Admission to Plaintiff Gregory Lesnik Eisenmann's First set of Interrogatories and Request for Production to Stjepan Papes	400.00/hr	40.00
12/18/2019 Identify and gather all Medical records, save to server, prepared for Doctors review 5.0	75.00/hr	375.00
locate, sort and organize Gregors radiographic evidence for fractures .2	400.00/hr	80.00
12/19/2019 Scanned Eisenmann's First set of Interrogatories, Request for Production, and Request for Admission to Plaintiff Gregory Lesnik and Eisenmann's First set of Interrogatories and Request for Production to Stjepan Papes, made searchable and saved to server .1	75.00/hr	7.50
Call from Bernay, memo to file .1	75.00/hr	307.50
Complete task of gathering Medical records and organize for doctor review 4.		
skim review, scan and make OCR searchable discovery requests to Lesnik and to Papes .2	400.00/hr	80.00
12/20/2019 Call with Bernay re settlement, status, discovery production by Eisenmann; memo to file .4	400.00/hr	200.00
E-mail to clients .1		
12/22/2019 e-mail from Bernay, and prepare detailed reply e-mail to Bernay about request to continue to delay discovery responses and production including review of discovery history .8	400.00/hr	400.00
E-mail from Bernay confirming settlement offer .1		
E-mail to Bernay re information specific to remaining claims .1		
12/26/2019 e-mail from Foran for Tesla, locate, scan, and save discovery propounded in May of 2018; e-mail to Foran, e-mail from Foran, e-mail to Foran .3	400.00/hr	120.00
12/27/2019 order transcript .1	400.00/hr	40.00

Gregor Lesnik

Page 174

	<u>Rate</u>	<u>Amount</u>
1/2/2020 multiple e-mails and calls with clients re settlement .5 Prepare e-mail to Bernay to respond to settlement offer .1 E-mail from attorney Holtzman for deposition of Lesnik .1	400.00/hr	280.00
1/3/2020 confirm flight details for Gregor Lesnik .1	400.00/hr	40.00
1/6/2020 Receive and review Eisenmanns Deposition Notice of Lesnik	400.00/hr	40.00
e-mail from Judge DeMarchis chambers, calendar .1	400.00/hr	40.00
1/7/2020 attend teleconference with defense counsel about settlement, negotiations, basis of claims, stipulation for confidentiality, discovery productions, deposition notice sent for date that WCD is not available and that was told to attorney Bernay was not available; memo to file; review Guidelines for Professional Conduct re discovery and scheduling 1.0	400.00/hr	400.00
1/8/2020 Served Response to Notice of Deposition of Lesnik, .1	75.00/hr	7.50
save pdf of Notice of Deposition, save OCR, prepare response to notice of deposition of Lesnik, prepare proof of service, save to pdf, e-mail to counsel 1.0 E-mails from and to defense counsel re confidentiality of mediation .1	400.00/hr	440.00
1/9/2020 Downloaded Eisenmann and Teslas Objections to Subpoena to Produce, made searchable and saved to server .2 Prepared shell for motion 1	75.00/hr	90.00
review pdf of Eisenmann objections to subpoena, review pdf of Tesla objections to subpoena; direct organization of requests and responses .2 Research proportionality, research enforcing subpoenas .3 Memo re text of subpoena to Eisenmann .1 Memo re documents identified in Third Amended Complaint and relationship to scope of things requested .3 Prepare detailed meet and confer e-mail to Foran .5 Prepare detailed meet and confer e-mail to Bernay .5	400.00/hr	2,680.00

Gregor Lesnik

Page 175

	<u>Rate</u>	<u>Amount</u>
Receive, save and review RT of CMC .2		
E-mail of yesterday from defendants' counsel first proposed draft of protective order; download, save, review; memo re changes in proposed order .8		
prepare revised proposed stip and order, E-mail to counsel regarding not stating what they changed from model order and attaching revision .5		
E-mails from Bernay re discovery, timing .1		
E-mails from Bernay on behalf of defendants re settlement conference issues, discovery and deposition .1		
Review Judge DeMarchi order, review Standing Order re Settlement Conference; prepare draft STC Statement, prepare inserts to STC Statement, complete STC Statement; prepare draft POS of lodging, prepare draft confidential letter to Judge DeMarchi for settlement conference 3.0		
E-mail to clients .1		
1/10/2020 e-mail to Judge DeMarchi individual issues statement .1	400.00/hr	200.00
E-mail to Judge DeMarchi and counsel all counsel statement .1		
Forward to clients .1		
Lengthy e-mail from attorney Foran objecting to all discovery and all facts for any production .2		
1/13/2020 Prepared Shells for Responses to Eisenmanns Interrogatories, Request to Produce and Requests for Admissions for Stjepan and Gregor 1.0	75.00/hr	7.50
locate Gregor billing records for medicals; locate former Tesla VP marketing posts; locate former Eisenmann Project Manager LinkedIn posts; prepare Gregor responses due to Eisenmann Corporation interrogatories, requests to produce, and requests to admit 3.0	400.00/hr	2,160.00
Locate, translate, and review Stjepan medical records and health care providers; review client memo re entries to work places and dates of employment at sites; prepare Stjepan responses due to Eisenmann Corporation interrogatories and requests to produce 2.0		
Prepare proofs of service .1		
E-mails to client Papes .1		
Complete to serve discovery responses .2		

Gregor Lesnik

Page 176

	<u>Rate</u>	<u>Amount</u>
1/14/2020 Receive and review Eisenmanns Settlement Conference Statement		40.00
	400.00/hr	
receive and save Eisenmann and Tesla STC Statement		440.00
.1	400.00/hr	
Prepare for and attend pre-settlement conference call scheduled with Judge Virginia K. DeMarchi; memo to file		
1.0		
1/15/2020 call with Stjepan		520.00
.1	400.00/hr	
skype with Stjepan		
.2		
meeting with Gregor		
1.0		
1/16/2020 Translate medical record		7.50
1.0	75.00/hr	
Assist with document location, filing and prep for settlement conference		131.25
1.75	75.00/hr	
call with Jackson for IT at court		1,000.00
.1	400.00/hr	
call with Judge DeMarchi		
.5		
call with Stjepan		
.1		
call with Danijel		
.1		
conference with Gregor and Danijel		
.7		
Call with court clerks re entries of default; e-mail to courtroom / docket clerks Miyashiro and Dibble		
.1		
Receive and save entries of default on Magna, d.o.o., HRID-Mont, d.o.o., ISM Vuzem, d.o.o., Rober Vuzem, Ivan Vuzem, D2N, LB Metal		
.2		
Receive from Stjepan medical records, save		
.1		
Translate cardiologist report		
.1		
Direct and assist in organizing in chron order all received Stjepan medical records		
.1		
E-mail to clients re conflicts		
.3 (no charge)		
e-mail to defense counsel re confidentiality stipulation		
.1		
Review court docket and compare to known filings		
.1		
E-mail to and from Bernay objecting to production absent protective order		

Gregor Lesnik

Page 177

		<u>Rate</u>	<u>Amount</u>
	and stipulation .1 E-mail from Holtzman of redline draft of proposed stip for protective order .1		
1/17/2020	Received and review Defendant Eisenmann Corp's Responses and Objections to First Set of Interrogatories and Request to Produce; and Specially-Appearing Defendant Eisenmann SE's Responses And Objections To Plaintiffs Gregor Lesnik And Stjepan Papes's First Set Of Requests To Produce	400.00/hr	40.00
	pick up Gregor, discussion with Gregor .5 Attend Settlement Conference before Magistrate Judge Virginia K. DeMarchi; including multiple e-mails during conference, conference with clients 10.0 Conference with Gregor, conference with Danijel .2	400.00/hr	4,280.00
1/18/2020	receive and save Material Term Sheet .1	400.00/hr	40.00
1/19/2020	make Term Sheet OCR searchable, Save to word, translate to Slovenian .3 e-mail to clients re meaning and effect of settlement, further activities .2	400.00/hr	200.00
1/20/2020	Working on information to go with the Declarations of William Dresser, Gregor Lesnik and Stjepan Papes 6.	75.00/hr	450.00
	save, make search, and review Eisenmann SE responses to request to produce .1 Same for Eisenmann Corporation responses .1 Prepare shell / draft for WCD declaration in support of motions for default; for Papes, for Lesnik .3 Locate photos of Gregor at hospital .1 Direct staff to locate, save and make searchable articles for insert into draft declarations .3	400.00/hr	360.00
1/21/2020	Worked on adding text to drafts of Request for Judicial Notice, and declarations in support of application for entries of default 2.0	400.00/hr	800.00

Gregor Lesnik

Page 178

	<u>Rate</u>	<u>Amount</u>
1/21/2020 review draft of inserts for Lesnik declaration .1 (partially charged) e-mails with Stjepan about entries of default .1	400.00/hr	80.00
1/22/2020 Worked on declarations 6.0	75.00/hr	450.00
e-mails with Bernay about limiting scope of disclosure of produced information .2 meeting with Gregor and Danijel to prepare draft declaration 1.5	400.00/hr	680.00
1/23/2020 Review and organize file 1.0	75.00/hr	75.00
review and discuss inserts for Gregor declaration .2 E-mails to counsel about settlement agreement .1 E-mails to and from counsel re Joint STC Statement .1 Prepare W-9, e-mail to counsel .1 (no charge)	400.00/hr	160.00
1/27/2020 Worked on pleadings for default judgment 4.	75.00/hr	300.00
1/28/2020 Identify and translate documents for Defaults 6.	75.00/hr	450.00
e-mails with consulting counsel at Schun & Elseven re Stuttgart court records .1	400.00/hr	40.00
1/29/2020 worked on defaults 4	75.00/hr	300.00
direct scan, saving, OCR and translation of contract terms .2 E-mails to counsel about not receiving settlement agreement, prepare proposed agreement 1.0 E-mail from Bernay .1 E-mails with counsel re protective order .1 E-mails to and from attorney Webber about class action counsel .2 (no charge) memo re calls to witnesses for supporting evidence on motions for entry of default .2 Memo re class counsel	400.00/hr	2,440.00

Gregor Lesnik

Page 179

		<u>Rate</u>	<u>Amount</u>
	.2 (no charge) attempted calls to CBSN, e-mail to Vladimir Duthiers		
	.1 Calls to and from and e-mails to and from Tanya Tambling		
	.2 (partially charged) e-mails with Schun & Elseven		
	.1 Add to draft declaration of Lesnik		
	.5 Review notes and e-mails from Papes, prior declaration, allegations of complaint as to Papes, Prepare detailed outline of and draft of declaration of Papes		
	3.5 E-mails to clients		
	.1		
1/30/2020	Gather documents relating to default motions, and prepare for exhibits 5.	75.00/hr	375.00
1/31/2020	e-mails with Tambling		200.00
	.1 Receive e-mail from Bernay attaching proposed draft protective order; review, print, sign, scan, and return	400.00/hr	
	.2 Call with Alex Holtzman re stip and approvals for filing; send and receive confirming e-mails		
	.2 e-mail to Holtzman		40.00
	.1	400.00/hr	
2/1/2020	save e-mails of past month with defense counsel		80.00
	.2 (partially charged)	400.00/hr	
2/3/2020	Worked on Defaults		300.00
	4. receive Order on Stipulation of Protective Order; save, print	75.00/hr	
	.1 E-mail to counsel about production	400.00/hr	120.00
	.1 E-mail from and to Bernay about intended production by Eisenmann		
	.1		
2/4/2020	Worked on Defaults		375.00
	5. e-mail with Christine Webber	75.00/hr	
	.1 (no charge) call with Titan about status of subpoenas, save served subpoenas	400.00/hr	1,400.00
	.1 Receive, save in pdf, and redact attorney client communication of October		

Gregor Lesnik

Page 180

	<u>Rate</u>	<u>Amount</u>
--	-------------	---------------

19, 2016 e-mail by Robert Vuzem

.1

Direct machine translation of and review and revise translation of Robert Vuzem e-mail to supervisors to not disclose time sheets

.1

Convert to pdf, save e-mail with translation as proposed exhibit

.1

Review and revise draft declaration of Papes in support of motion for judgments

1.0

E-mail from Bernay with link for production

.1

Receive, download, and save to format to view Eisenmann production; save pdf of visas and welcome letters

.4

Prepare snip screen of folders and files of Eisenmann production

.1

Call to Colin West, counsel for BMW

.1

Prepare subpoena to BMW, review corporate status information for BMW, prepare attachment to subpoena to BMW, create subpoena order for Titan Legal Services

1.2

Call to Titan Legal

.1

Call to Tanya Tambling, call with Hunter Pyle, memo to file, calendar call with Hunter Pyle

.1

E-mails with Schlun & Elseven

.1

2/5/2020 Worked on exhibits for Papes declaration, translated documents and put in pleading form

5.

75.00/hr

375.00

review Schlun & Elseven e-mails

.1

Call to bank, Wire to account of Schlun & Elseven; receive wire confirmation .2 (no charge)

e-mail to Schlun & Elseven

.1

Direct additions to draft Papes declaration

.2

E-mails with Bernay, review prior e-mails, save e-mail from Holtzman

.1

Download, save, print and review Eisenmann responses to interrogatories and requests to produce with verification and proof of service but no production

.3

E-mail to Foran regarding production date by Tesla

.1

400.00/hr

400.00

Gregor Lesnik

Page 181

	<u>Rate</u>	<u>Amount</u>
E-mail from attorney Foran, calendar production due date .1		
2/6/2020 Translating documents for exhibits and added to declarations supporting defaults 6.	75.00/hr	450.00
Receive and review letter from Titan re BMW Subpoena	400.00/hr	40.00
e-mails with Schlun & Elseven .1	400.00/hr	1,160.00
Prepare for, call with Hunter Pyle and Tanya Tambling, and memo to file .5 (partially charged)		
locate Papes statements in Slovenian, direct machine translations, memo and additions to draft declaration .3		
Review and revise Papes declaration .2		
Locate exhibits for Papes declaration, begin to segregate by categories of exhibits for Papes declaration .5		
Add to Papes declaration, save as v-2, save to pdf 2.0		
E-mail to Papes, Lesnik and Travancic .1		
E-mails with Pyle and Tambling .1		
E-mails to counsel about status of settlement agreement .1		
2/7/2020 phone call with Thomas Bichat of SE Legal, in Germany, re copies of court filed pleadings and other documents in the file of the Eisenmann SE petition for insolvency and reorganization at Stuttgart District Court .4	400.00/hr	1,200.00
E-mail to attorney Thomas Bichat of Schlun & Elseven .1		
E-mails with counsel, review and revise draft Joint settlement status report .3		
Receive e-mail from counsel, receive and save proposed settlement agreement .1		
Review proposed agreement, prepare reply e-mail to counsel .2		
Research taxation issues, save articles; memo to file .2		
E-mail to clients re settlement agreement and W-8BEN form .1		
E-mail to counsel re withholding tax and payee .1		
Discuss with staff organization of Papes medical records, direct saving to pdf		

Gregor Lesnik

Page 182

	<u>Rate</u>	<u>Amount</u>
and creating group pdf with bookmarks .2		
Research re non-disparagement agreements, save article .2		
Call with Ethics Hotline, memo to file .1		
Prepare draft memo to opposing counsel detailing concerns and issues with settlement agreement .5		
E-mail to clients re status of formal long form settlement agreement .1		
Review and revise draft memo, and E-mail to defense counsel .1		
Call with Stjepan, e-mail re opinion of causation, and re revising declaration with additional information re wages .2		
E-mails to and from Bernay about draft settlement agreement, and re notification to AUSA Michelle Lo .1		
E-mail from Pyle re proposed terms .1 (no charge)		
2/7/2020 phone call with Thomas Bichat of SE Legal, in Germany duplicate entry .1	400.00/hr	40.00
2/8/2020 multiple e-mails with Stjepan about medical issues and medical records, hours worked, translations .2	400.00/hr	80.00
2/9/2020 locate, save to pdf, review, and make searchable Material Term Sheet .2 E-mail to Palmer about motions for default judgments .1	400.00/hr	120.00
2/10/2020 worked on defaults 5. Call from Hunter Pyle, set appointment, memo to file .1	75.00/hr	382.50
e-mail from Stjepan explaining how compensation paid .1 Locate Papes pay records, review, sort and save .2 Call with Papes, memo to file .2 Direct organization and saving of medical records by date and description .1 (partially charged) e-mail from Palmer; prepare memo for intended phone call .1 (no charge) e-mail from Papes of doctor names .1	400.00/hr	360.00

Gregor Lesnik

Page 183

	<u>Rate</u>	<u>Amount</u>
E-mails (4) from Papes re locations, dates, and hours of work in US for Papes; save attachments; review Slovenian and translations .2		
2/11/2020 Translate documents and worked on revision of Papes declaration, locate and identify documents for exhibits 6.0	75.00/hr	450.00
e-mails of yesterday from Foran, locate both link and password, attempt download, save .3	400.00/hr	1,440.00
Attempt to open attachments from download of Tesla production, including internet search, use of multiple programs, and calls with IT consultants, multiple e-mails to and from attorney Foran re opening and saving enclosed tif files 1.0		
Save Tesla production .1		
Review select documents, review totality of production, evaluate analysis of same .2		
Review Papes revisions and inserts and revisions to draft Papes declaration .2		
Phone appt with Hunter Pyle .5		
E-mail from court of OSC to identify default defendants; search prior e-mails, locate prior notice, calendar due date based on OSC .1 (partially charged)		
e-mail from Papes with attachment of statement from ISM Vuzem worker .1		
E-mail from Papes with attachment and link to Vuzem ownership .1		
Locate and save exhibits for Papes declaration re dates of employment, date of termination, certificate of taxes due, date of start of employment, contracts with Vuzem, and other employment documents .4		
Locate and save exhibits re Vuzem and HRID financials and ownership .2		
Receive and save Eisenmann third production from link; declarations of custody .2		
Call with Bernay, locate production of list of workers by name with street addresses; save list .1		
E-mail to clients re productions, attach stipulated protective order .1		
2/12/2020 Located, translated, identified and named medical and work related documents, documents and photos for exhibits 7.0	75.00/hr	525.00

Gregor Lesnik

Page 184

		<u>Rate</u>	<u>Amount</u>
2/12/2020	locate and save for exhibits employee pay summaries, visas, Eisenmann letters, letters by defendants to media, Vuzem calculation sheet for hours, and other documents .2 (partially charged) Discuss with staff further information for draft declaration of Papes .1 (partially charged) e-mail from counsel, review revisions in track changes proposed long form settlement agreement, e-mail to counsel re scope of disclosures .2 Call with Stjepan, e-mail to Stjepan re causation issues .3 Direct machine translation of dismissal of charges against Gregor .1 Open and review Tesla excel spreadsheet .1 E-mail to Foran for clarification of production by Tesla .1 Direct organization and saving in pdf for exhibits Papes employment and pay documents .1 Review documents received throughout litigation for exhibits including photos and describing exhibits, organize and save in subfolders for use as exhibits to declarations 1.0	400.00/hr	880.00
2/13/2020	identify docs and save for exhibits .5	75.00/hr	37.50
	Call bank re routing information, save memo .1 (level 3)	45.00/hr	4.50
2/16/2020	receive and save signed agreement from Lesnik .1 E-mails from Stjepan of proposed employee Statements, download, save and review statements; prepare declaration to authenticate statements, prepare witness specific authenticating declarations, e-mail to Stjepan .4 Prepare draft of detailed letter with attachments to counsel re incomplete productions; save attachment of timesheets .4 receive and save signed agreement from Lesnik .1 Print signature page, add WCD signature, scan, save, combine signature pages, combine to settlement agreement, save .1 Multiple e-mails and calls with Papes about what is required for declarations .6 Prepare for and call with Palmer; prepare e-mail to Palmer re status, confidentiality stipulation, and requirements for motions for default .4	400.00/hr	880.00

Gregor Lesnik

Page 185

	<u>Rate</u>	<u>Amount</u>
E-mail from Palmer .1		
2/17/2020 identify docs and save for exhibits 7	75.00/hr	525.00
locate from all litigation documents for Lesnik declaration, organize into subfolders for exhibits to declaration 1.0	400.00/hr	3,640.00
Prepare W-9, E-mail to counsel agreement and W-9, noting typ0 .1		
Prepare draft motion for default judgment for coerced labor 2.5		
Prepare draft motion for default judgment for California wages claims .6		
Prepare very initial draft declaration of WCD re defaults .5		
E-mail from Papes of further statements, save attachments, convert to pdf, combine, translate .2		
E-mail from Bernay .1		
Organize to file declaration of Nedejko Zivanic .2		
Prepare very initial draft motion for default judgment for FLSA claims .3		
Review to do memo, revise same .3		
Organize and begin to identify by exhibit number exhibits for declarations .3		
Prepare draft motion for default for FCA 3.0		
2/18/2020 Translate witness declarations, identify docs and save for exhibits 6.0	75.00/hr	450.00
review Third Amended Complaint, and inserts, direct staff to review same for assistance with declarations .3	400.00/hr	3,640.00
Machine translate proposed Maslic statement; Take draft Maslic statement and change to declaration, save in word and in pdf .6		
E-mails with Papes about form of declarations and re need for witness contact information .1		
Review Sincek statement, save, translate, review .2		
Prepare draft request for judicial notice including locate prior requests .3		
Discuss with staff translations .1 (partially charged)		
call with Martina Vandenberg		

Gregor Lesnik

Page 186

	<u>Rate</u>	<u>Amount</u>
.2		
Add to draft motion for default for FCA judgment		
1.5		
E-mail from Papes, take attached proposed Rebic statement / declaration, save, machine translate, review, revise, prepare as draft declaration; call with Papes, e-mail to Papes, receive later e-mail of signed Rebic declaration		
1.0		
E-mail Lo to Bernay re dismissal without prejudice of FCA claim		
.1		
Research human trafficking litigation, save articles		
.4		
Locate and save information re David v Signal Trafficking		
.2		
Substantial revisions to draft FLSA motion to add draft outline and authorities		
1.0		
Review prior draft calculation of California class action wages claims, evaluate facts based on update information		
.6		
Add to draft WCD declaration in support of defaults to add service, notice, entries of defaults, causes of action for which judgment is sought, and start of authentication from prior litigation		
1.8		
Add to draft motion for default re California wages of outline of claims and supporting statutes and regs		
.5		
E-mail to Vandenberg		
.1		
E-mail to Palmer		
.1		
2/19/2020 Call with Stjephan Papes re Declaration, revised Declaration with Papes answers		400.00
1.0	400.00/hr	
Discuss Tesla production, review combined copies of security entries to Tesla; compare with Eisenmann employee lists, begin to prepare index of Tesla production by employee names		337.50
1.0	75.00/hr	
Index by bates number, letter or visa, date, signer of letter, and employee Eisenmann production		
4.5		
e-mail from Papes, save to file Maslic declaration, e-mail to Papes		4,000.00
.2	400.00/hr	
E-mail from Papes of revised Koscak declaration, review, save, e-mail to Papes		
.2		
E-mail from attorney with Vandenberg's office		
.1		
Locate 9th Circuit damages awards under trafficking causes of action, save memo		
.3		

Gregor Lesnik

Page 187

	<u>Rate</u>	<u>Amount</u>
Memo to update service list for motions for entry of default judgments .1 Discuss with staff Tesla production, direct indexing of same .2 (partially charged) Discuss with staff Eisenmann production, direct indexing of same .2 (partially charged) E-mail from Papes, review translated Koscak draft declaration, change to declaration format, e-mail to Papes .4 Discuss with staff additions and revisions to Papes declaration .3 Review and revise draft declaration of Papes for client review, save to Word 1.0 E-mail to Papes .1 Review index to date of Eisenmann production of 2/3/2020 .1 Receive notice of Order Amending Schedule, download, save, print, revise calendar .1 E-mail to Pyle of court modification of schedule for filing motions for default judgment .1 E-mail from Stjepan of revisions .2 E-mail from Papes of prior e-mails re Vuzems supervisors being directed to not provide to workers information about hours worked .1 E-mail to Papes .1 E-mail from Papes re photos, review, e-mail to Papes .1 Multiple e-mails from Papes re worker information; review all .2 Review, revise and add to Papes draft declaration, e-mail to Stjepan 2.0 E-mail from Colin West objecting to subpoena to BMW, e-mail to West .3		
2/19/2020 Combine in acrobat Tesla productions, save, make searchable, save again separately .3 (level 3) Combine in acrobat Eisenmann productions, save, make searchable, save again separately .3 (level 3)	45.00/hr	27.00
2/20/2020 Call with Stjepan Papes re Declaration, revised Declaration with Papes answers 7.	75.00/hr	525.00

Gregor Lesnik

Page 188

	<u>Rate</u>	<u>Amount</u>
2/20/2020 complete index by bates number, letter or visa, date, signer of letter, and employee Eisenmann production 2.0	75.00/hr	300.00
Memo of workers listed on security badges for entry to Tesla, by bates numbers pages 1 to 92 for date ranges 2.0		
Combine in acrobat further portions of Tesla productions, save, make searchable, save again separately .3 (level 3)	45.00/hr	13.50
e-mail to attorney West attaching stipulated protective order .1	400.00/hr	1,520.00
e-mail from Pyle re motion schedule, and review of documents .1		
Receive from Papes modifications to declaration, Review and revised draft declaration of Papes for client further review 1.0		
E-mail from Papes re witnesses available or not for declarations .1		
E-mail from Papes of other witness statements .1		
E-mail from Papes with signed Rebic declaration .1		
Discuss with staff questions for Stjepan .1		
Revise draft WCD declaration re causes of action and claims subject of pending motions for default .1		
Discuss with staff revisions by Lesnik to draft declaration; save, print, give to Danijel Travancic, review with Gregor 1.0		
Add to questions for Stjepan .1		
E-mail from Papes, save attached supervisor records for hours worked at BMW by groups, review same .2		
Sort text by Papes, save to word, memo to staff for revisions to declaration .2		
Add to motion for default judgment for FCA cause of action to add analysis of obligation and categories of damages .5		
E-mails to and from local contractors who had competed for jobs at Tesla, taken by Vuzem .1		
2/21/2020 Memo of workers listed on security badges for entry to Tesla, by bates numbers pages 302-474 October 2015 and 1301 to 1416 for July to October 2014 date ranges 3.0	75.00/hr	367.50
Revise Tesla worker memo to place workers in alpha order by last name .5		

Gregor Lesnik

Page 189

		<u>Rate</u>	<u>Amount</u>
	Revise Eisenmann production memo to highlight workers not on Eisenmann workers list .4 Prepare memo of workers on Tesla documents not on Eisenmann workers list and of workers on Eisenmann documents not on Eisenmann workers list 1.0		
2/21/2020	Combine in acrobat further portions of Tesla productions, save, make searchable, save again separately .3 (level 3)	45.00/hr	13.50
	memo re numbers of workers based on Eisenmann list with additional information from visas, letters and security entry records; direct staff to continue with indexing of productions to fill in numbers of workers .2 Locate visas for workers for companies other than Vuzem .1 Prepare draft / outline for Palmer declaration based on CV, and known credentials, and shell of information requested .8 Add to draft motion for default judgment for coerced labor claims to add history of statute and to add results from other federally filed coerced labor cases .7 Prepare letter to defense counsel re incomplete productions and Eisenmann incomplete listing of workers, save to pdf, e-mail and mail to Tesla and Eisenmanns counsel 1.0 Add to MPA on FCA claims based on numbers of workers from produced information and documents .3 Memo to revise and add to Papes declaration .2 Further memo to revise and add to draft Papes declaration 1.0	400.00/hr	520.00
2/22/2020	e-mail from Papes, review Papes revisions .2 prepare inserts to draft declaration, e-mails with staff and with Papes 1.0 Review Eisenmann counsels proposed stipulation for dismissal .1 Review Papes e-mail with statement from another worker, with inapplicable certification, save statement, read same .3 Review e-mail from Titan legal re BMW response to subpoena .1 Review pleadings and orders on applications for and orders on motions for default judgments in various coerced labor cases, save pleadings and orders 1.5 Add to draft motion for default judgment on coerced labor claims to revise citations	400.00/hr	2,920.00

Gregor Lesnik

Page 190

	<u>Rate</u>	<u>Amount</u>
.1 Add to draft motion for default judgment on FCA claims to add information about actions of other Labor Subcontractors		
.5 Review Papes declaration with Papes inserts, direct further revisions		
.4 research enforcement of judgments in Slovenian and Croatian jurisdictions, ave articles, save laws on civil procedure, save statutes re collections		
1.5		
2/23/2020 update EFC info into WCD decl default		135.00
.8 Locate files for exhibits that are time/pay related and organize	75.00/hr	
1		
receive e-mail from Gregor of statement in Slovenian of his damages and injuries; machine translate; call to Travancic		1,640.00
1.0 Review Papes declaration with Papes inserts, direct further revisions	400.00/hr	
.4 Add to draft FCA motion		
.5 Locate e-mails from representatives for other defendants, save as pdf for exhibits		
.2 Add to draft WCD declaration in support of motions for judgments		
1.0 Review draft Papes declaration with staff additions, save		
.3 Add WCD revisions and additions		
.6 E-mail to Papes		
.1		
2/24/2020 Receive and review Titan invoice SU327684-02-01		40.00
SAD REJONOWY I WYDZIAL CYWILNY- Certificate of document service- Doc not served to Enterprise MDM Poland SP d.o.o.- is not existing at the address indicated by the applicant	400.00/hr	
Letter from Morgan Lewis re: subpoena issued to BMW Manufacturing Co.: Notice of Improper Service and Prophylactic Objections		
revise and complete memo re workers identified on productions		75.00
1.0 (partially charged)	75.00/hr	
e-mail from Papes of additions and revisions to declaration, save		3,280.00
.1 Review, revise and put in form of further draft of Papes declaration for client review	400.00/hr	
.6 Discuss with staff memo re workers identified from productions		
.3 Discuss with staff and assist with indexing of exhibits for portion of Papes		

Gregor Lesnik

Page 191

	<u>Rate</u>	<u>Amount</u>
declaration re wages .5		
Discuss with staff adding ECF # to WCD declaration .1		
E-mail to Papes combined proposed wages exhibits with descriptions .3		
Discuss with staff and assist with indexing of exhibits for portion of Papes declaration re employment contract .3		
Discuss with staff and assist with indexing of exhibits for portion of Papes declaration re photos .2		
Discuss with staff and assist with indexing of exhibits for portion of Papes declaration re security badges .2		
Assist and direct in combining exhibits, e-mails to Papes .2		
Save to text motions, pleadings, orders and judgments on motions for defaults in other federal causes based on coerced labor claims 1.0		
Prepare proposed Order granting motion for default on FCA claim 2.0		
Prepare shell for proposed Order granting motion for default on coerced labor claims .5		
Locate Vuzem proposed release of claims - never paid to workers .1		
Prepare initial draft of Travancic declaration re interactions with Vuzem management and supervisors for coerced labor claim 1.2		
Call to and E-mail to Travancic .1		
Review, revise and add to draft Order granting motion for judgment on FCA claims .5		
2/25/2020 prepare indexes of exhibits based on pdf naming 5.0	75.00/hr	375.00
e-mail from defense counsel, download and save executed agreement; save; forward by e-mail to clients final executed copy of settlement agreement; calendar due dates .2	400.00/hr	2,800.00
locate and save travel records for Lesnik .1		
Discuss and assist with index of exhibits for Papes declaration re visa documents .2		
Extract and save exhibits re trafficking, number order for Lesnik declaration 1.0		
number order exhibits for Papes declaration 1.0		

Gregor Lesnik

Page 192

	<u>Rate</u>	<u>Amount</u>
Texts with Palmer, Prepare revision to draft for Palmer declaration, e-mail to Palmer		
.1		
E-mails from and to Palmer re credentials stated in declaration		
.1		
E-mails with Papes and staff of penultimate draft of Papes declaration with lists of exhibits		
1.0		
Revise grammar, revise inserted exhibit lists, move exhibits listed to logical ordering, save and penultimate draft for client review		
1.2		
Save as combined all Papes declarations prior to redactions		
.1		
Prepare draft letter and e-mail to Papes,		
.1		
Discuss with staff Index Lesnik contracts and wage exhibits		
.1		
Locate exhibits for WCD declaration of locations, and of other claims involving other workers and other companies		
1.0		
Direct and assist with index of exhibits for Lesnik declaration re coerced labor claim		
.2		
E-mail to Travancic		
.1		
Complete Papes declaration, complete exhibits prior to redaction, e-mail to Stjepan with directions		
.5		
2/26/2020 add exhibit numbering to individual exhibits		450.00
2.0	75.00/hr	
Review exhibits for financial information and dates of birth		
2.0		
Redact financial information and dates of birth, re-scan and incorporate into exhibits to Papes declaration		
2.0		
e-mail from Papes, save signed declaration		6,240.00
.1	400.00/hr	
Discuss with staff and assist with adding exhibit numbers do exhibits		
.2		
E-mail from Palmer, save revisions by Palmer, incorporate information into draft declaration, add additional known facts specific to support conclusions		
1.0		
Review proposed excel spreadsheet calculations		
.1		
E-mail to Palmer including explanation of revisions		
.3		
Review local rules, compare to information required by other districts on motions, save local rules, memo to file, add to draft WCD Declaration		
1.2		
Review draft proposed Joint CMC Statement, make revisions in track		

Gregor Lesnik

Page 193

	<u>Rate</u>	<u>Amount</u>
changes, e-mail to defense counsel		
1.0		
Save to file Papes declaration		
.1		
Add to draft Motion for coerced labor claims to analysis of serious threats		
.2		
Add to draft Motion for California wages to clean up procedural history and to add Papes facts re work time under California analysis		
.5		
Review with staff inserts of redacted exhibit pages		
.2 (partially charged)		
locate additional Lesnik exhibits based on his statement		
.2		
E-mail from Holtzman, Call with defense counsel Holtzman to discuss revisions and filing of CMC Statement		
.1		
memo to translate contracts, translate Papes and translate Lesnik, prepare memo for review by Travancic		
.8		
Organize Lesnik declaration by categories, remove duplicate statements, correct for grammar, add information from recent statement re damages		
.4		
Discussion with Travancic, revise Travancic declaration		
1.0		
Discussion with Travancic, revise Lesnik declaration		
1.0		
complete revised proposed Gregor Lesnik declaration with references to Exhibits		
.5		
Add substantial fact additions to motion regarding coerced labor claims		
4.0		
E-mail to Gregor		
.1		
Complete draft motion for default judgment for coerced labor		
2.5		
E-mail to Taube		
.1		
2/27/2020 Redact financial information and dates of birth, re-scan and incorporate into exhibits to Lesnik declaration	75.00/hr	412.50
1.5		
Review Papes declaration, prepare memo of work locations and work hours (start)		
4.0		
e-mail from Gregor, save signed declaration		2,800.00
.1	400.00/hr	
Discuss with staff redaction of financial, social and date of birth information		
.2		
E-mail from Palmer, review attachment, e-mail to Papes re numbers of workers and spreadsheets		
.2		

Gregor Lesnik

Page 194

	<u>Rate</u>	<u>Amount</u>
Save to server all drafts and completed MPA and declarations		
.2 (no charge)		
save to file Rebic Declaration		
.1		
Save to file Travancic Declaration		
.1		
Save to file Lesnik declaration		
.1		
save translated employment contract; copy to Word, clean up grammar, clean up formatting, save for review by Travancic; e-mail to Travancic		
.5		
Save translations of declarations		
1.0		
Review inserts by staff to draft WCD declaration		
.1		
Review and revise service list for motions for entry of default judgments; locate contacts for Branko Tomas, save contact information; add to service list		
.4		
Prepare shell proof of service for filing		
.1		
E-mail to and call with Taube re interpretation of coerced labor claimants		
.1		
Review Google translate Mucic, Rebic and Zivanic declarations		
.1		
save to file Rebic Declaration		
.1		
Save to file Mucic declaration		
.1		
Save to file Zivanic declaration		
.1		
E-mail to Travancic for translations to compare and complete		
.1		
Review with staff initial calculations for FLSA wages		
.2		
Prepare revised declaration of Palmer, version 2 of this date		
.4		
E-mail to Judge Kohs clerk for scheduling motions		
.1		
Receive Scheduling Order, save		
.1		
Memo of revisions to California and FLSA wages motions		
.2		
Receive notice of continued CMC, save, calendar		
.1		
Google translate Premuzic statement re Lesnik declaration		
.3		
evaluate use of Premuzic statement		
.1		
Locate and save docs from litigation of workers and management from other companies and relationship to Vuzem		
1.0		

Gregor Lesnik

Page 195

		<u>Rate</u>	<u>Amount</u>
	Add to draft WCD declaration in support of motions for default including facts and documents re numbers of B1-B2 workers and of Vuzem workers .5 Research local rules re e-filing under seal, save procedures on website .5		
2/27/2020	Review and save Eisenmann objections to production, review e-mails by defense counsel of objections to production, save STC Statements, organize saved productions by defendants and by dates, review e-mails re promised productions, review stipulated protective order, review e-mails to chambers re proposed order, 1.0 E-mail to counsel for Eisenmann regarding production by Eisenmann and manner of production .1 Review federal and state trafficking statutes for proper plaintiffs; review corresponding criminal statutes and regulations; save statutes and regulations, prepare memo of analysis 2.0 E-mail to Vandenberg .1 E-mail from and to Koenig re status .1 Save combined in adobe additional Tesla entry records by date ranges .2 Extract pages of entries for use as exhibits .3 E-mail to defense counsel proposed documents to request withdrawal of confidentiality designation .3 Begin shell of motion to file under seal .3 Save as potential exhibits e-mails with counsel .1 Add to FCA motion facts re workers based on defendants productions .1 Prepare inserts re Mladen Gregurec .2	400.00/hr	1,920.00
2/28/2020	create exhibit list for WCD decl, label exhibits- create footers w/ exhibit numbers, insert exhibit list in to WCD decl, redact requested information, scan and update exhibits, assist WCD in combining exhibits with WCD decl	75.00/hr	375.00
	complete memo of work locations and work hours for Papes, prepare draft calculations for wages spreadsheet 5.0	75.00/hr	375.00
	e-mail from Palmer, receive final Palmer declaration, convert to pdf, save to e-file .2 Sort Papes declaration only, extract text .1 (partially charged)	400.00/hr	6,320.00

Gregor Lesnik

Page 196

	<u>Rate</u>	<u>Amount</u>
call with Bernay re request to withdraw confidentiality designation, memo to file		
.2		
Call to Foran, left vm		
.1		
Discuss translation of article re Premuzic human trafficking		
.1		
Sort, save, and direct index of exhibits to WCD declaration		
.3 (partially charged)		
E-mails from Holtzman and Bernay that Eisenmann will not withdraw confidentiality designation and proposing what Eisenmann would allow to be filed; save attachments, compare to other copies of documents		
.4		
Review calculation of Papes hours at all locations		
.2		
Review and revise exhibit list for WCD declaration		
2.0		
Add to and revise WCD declaration, save, print, sign, scan, compile with exhibits for filing		
1.0		
Prepare insert of explanation of FLSA wages for motion for Papes individual wages claims		
.2		
Add fact references to coerced labor claim motion, save in final form; review for tables and authorities, save for filing		
2.0		
Add fact references to FCA motion, review for tables and authorities, add references to other companies and relationship to Vuzem, Gregurec and Eisenmann, re-review tables and page references, save for filing		
2.0		
Complete proposed order on FCA		
1.0		
Complete proposed order on coerced labor		
1.0		
Revise calculations of FLSA and California wages to incorporate into single motion, re-order motion, correct for tables and page references, complete attachment spreadsheet		
2.0		
Complete proposed order on Papes individual wages claims		
1.0		
Upload all motions (interspersed with corrections of tables; only partially charged)		
1.0		
Review ECF filing guidelines, multiple efforts to make all declarations able to be filed, sort WCD declaration into subparts to save bookmarks		
1.0		
2/29/2020 printing motions for default judgement 16 sets, plus chamber copy for court, assembling into envelopes and ready for mailing time 5.5	75.00/hr	412.50

Gregor Lesnik

Page 197

		<u>Rate</u>	<u>Amount</u>
2/29/2020	complete e-filing, confirm receipt of e-notices of filing all documents 1.0 (partially charged) download and save filed motions 1.0 Direct staff in printing, sorting and preparing for mailing .5 Locate postal location to mail on February 29, determine not open as late as noted, organize documents to serve by mail on March 1 .2 (partially charged) (level 3) research standards for confidentiality, filing under seal, and declarations; memo of language to use in application 1.0 prepare application to file under seal, including identifying exhibits by same reference as in motions with authenticating declaration additional to file declaration, including to prepare declaration 2.0 Prepare proposed Order .3 follow procedures for application to file under seal .2 E-mail to counsel unredacted documents sought to be filed under seal .1	400.00/hr	2,440.00
3/1/2020	prepare revised proposed Order for Papes Judgment for Wages .2 complete print and organization of documents to deliver to US Post Office 1.0 (partially charged) assist in assembling documents with certified mail receipt forms .3 Attempt to deliver pleadings to US Postal Service 1.0 (no charge)	400.00/hr	600.00
3/2/2020	printing, mail prep and mailing of motions via USPS at Post Office, 16 international and 4 domestic 2.5	75.00/hr	187.50
	Review, and save, requests and statements for upcoming CMC .1 discuss with staff generating copies of pleadings for class action co-counsel Hunter Pyle .2 (partially charged)	400.00/hr	120.00
	deliver pleadings to US Postal Service 1.0 (level 3) direct and assist with printing and organization of filed pleadings for delivery to chambers 1.0 (level 3)	45.00/hr	90.00
3/3/2020	discuss and review number and costs for printing of default motions .2 (no charge) prepare A-R of costs to date; review for accuracy, reprint, save to pdf .3 (no charge)	400.00/hr	760.00

Gregor Lesnik

Page 198

	<u>Rate</u>	<u>Amount</u>
--	-------------	---------------

prepare History Report for Court billing statement to date

.2 (no charge)

receive court notice correcting hearing dates, download, save update calendar

.1

receive court notice correcting hearing dates, update calendar

.1

Save e-mails of past week with clients, court, Tesla and Eisenmann counsel, translators, consultant, and assisting counsel

.3 (partially charged)

save to pdf e-mails with counsel for Tesla and Eisenmann re document productions

.1

E-mails from and to clients re fee agreements, costs and distributions specifics with multiple attachments

.2 (partially charged)

e-mails to and from Papes for accounting

.1 (partially charge)

e-mails with defendants counsel re form of dismissal Order, review proposed Order

.1

E-mail to counsel for US DOJ re form of stipulation and proposed Order for dismissal

.1

Prepare draft Amended POS on motions for default (3)

.3

E-mail to clerk, call with clerk about accuracy for notice to defendants, e-mails with clerk about due process notice

.1 (partially charged)

Receive further Amended Clerks Notice Correcting Hearing Dates

.1

Complete Amended POS on motions for default (3), scan, sign, prepare to e-file and e-file

.3

3/3/2020 deliver pleadings to US Postal Service

1.0 (level 3)

45.00/hr

45.00

3/4/2020 e-mail with Michelle Lo of US DOJ re form of dismissal, and deft request to include dismissal with prejudice of FCA claims

400.00/hr

1,200.00

.1

Prepare detailed e-mail to Lo identifying language of settlement Term Sheet, formal Confidential Settlement Agreement, draft Stip and Order from defendants attorneys, and revised proposed Stipulation and Order consistent with government position, with attachments

.4

E-mail to Palmer

.1

E-mail to Vandenberg

.1

E-mails with Papes re distributions

.1 (no charge)

Gregor Lesnik

Page 199

	<u>Rate</u>	<u>Amount</u>
e-mails with clients re distributions		
.1 (no charge)		
review notes of calls with clients and witnesses; update employee contact information		
.2		
E-mail from Foran agreeing to edits in proposed Stipulation and Order		
.1		
E-mail from Bernay agreeing to edits		
.1		
Receive and review e-mail of yesterday from Foran attaching Tesla custodian declaration, save and receive Decl of Senior Access Control Specialist		
.1		
Receive and review e-mail with attachments from 3/2 from Foran attaching Tesla production, save		
.2		
Receive e-mail from Linda Chiem of Law 360 and e-notice from Law 360		
.1		
Receive confirmation e-mail from AUSAG Michelle Lo		
.1		
Review and revise proposed Stipulation and Dismissal based on further edit by counsel for Eisenmann, e-mail to counsel		
.1		
E-mail from counsel		
.1		
E-mails with attorney Foran regarding Tesla document production		
.1		
Begin review and analysis of Tesla spreadsheet for 2016 entries to site		
.4		
E-mail from Papes re contacts and work locations and dates for co-workers GR and LH		
.1		
receive, save and review statement from co-workers TP		
.1		
Receive, save and review attachments of work place notes from co-worker ST, and texts from co-worker ST		
.1		
E-mails from counsel for Tesla and for Eisenmann re edits to dismissal documents		
.1		
review Tesla spreadsheets, identify missing data and dates of data		
.2		
E-mail to counsel Foran		
.1		
Distributions to clients		
1.0 (no charge)		
3/5/2020 e-mail from Foran re gaps in Tesla spreadsheets		2,760.00
.1	400.00/hr	
e-mails with counsel about filing dismissal documents		
.1		
Save to file Stipulation for Dismissal and proposed Dismissal Order, e-file		
.1		

Gregor Lesnik

Page 200

		<u>Rate</u>	<u>Amount</u>
	Prepare revised proposed Orders granting judgments on motions for Wages, and for FCA, based on amended order re dates of hearings		
	.1		
	E-mails to Judge Koh attaching revised proposed Orders		
	.1		
	Receive e-notice of and filed opposition by Eisenmann to Administrative Motion to File Under Seal, Declaration of Ta, Declaration of West, Eisenmann proposed Order; save, review		
	.2		
	Locate e-mails to counsel re incomplete productions, save to pdf		
	.1		
	organize digital documents of pleadings, notices, and source documents for Pyle; review binders of printed documents		
	2.0		
	Prepare final list of documents to deliver to co-counsel Pyle		
	.2		
	prepare Summary of Case for Pyle		
	.5		
	Update list of co-workers with contact information		
	.2		
	E-mail to Pyle		
	.1		
	E-mail to clients re co-counsel and status		
	.1		
	Travel to and conference with Hunter Pyle and Tanya Tambling		
	3.0		
3/6/2020	Receive and review Return receipt of Registered mail from Vuzem USA, Inc. C/o CA Sec of State	400.00/hr	40.00
	e-mail to Judge Koh attaching proposed Order confirming dismissal		280.00
	.1	400.00/hr	
	E-mail from Papes of list of Vuzem workers that he spoke with, save attachment		
	.1		
	Discussion with Papes about attorneys speaking to witnesses and formal declarations from co-workers witnesses		
	.5		
3/7/2020	receive Order of dismissal (partial)		80.00
	.1	400.00/hr	
	receive Order dismissing as moot motions to quash		
	.1		
3/9/2020	call with Pyle		280.00
	.1	400.00/hr	
	Locate names and contact information for interpreters, prepare memo, e-mail to Pyle		
	.1		
	E-mails with Pyle re scope of claims under the Third Amended Complaint		
	.1		

Gregor Lesnik

Page 201

		<u>Rate</u>	<u>Amount</u>
	Discuss with staff status of list of Vuzem workers, updates, saving spreadsheet of data needed for class claims; review revised co-worker list .3 E-mail from attorney Foran of closure dates for Tesla .1		
3/10/2020	Receive and review Return registered proof of delivery Branko Tomas Brotto Company USA, Inc. PO Box 27740 Returned from ISM Vuzem USA, Inc. C/o Branko Tomas 1600 Azalea Hill Drive, Unit 304 Greenville, SC 29607- return to sender attempted-not known unable to forward	400.00/hr	40.00
	e-mails with Pyle re common questions, why California vs FLSA was chosen for class, predicate facts alleged, and why claims limited to Vuzem and owners of Vuzem .4 E-mails re scheduling, calendar .1 E-mail from Lesnik re co-worker time periods at Vuzem .1	400.00/hr	240.00
3/11/2020	e-mail from Papes re status of investigating co-worker time periods at Vuzem .1 Direct scan and saving of pleadings returned by US Postal Service mailed to US entities .1	400.00/hr	80.00
3/12/2020	Receive and review invoice from Titan	400.00/hr	40.00
3/13/2020	file check names and addresses in co-worker spreadsheet. .5	75.00/hr	37.50
	Update ISM Vuzem employees spreadsheet 8.	75.00/hr	600.00
	discuss with staff revisions and additions to list of ISM Vuzem, d.o.o. employees .2 Discuss with staff spreadsheet limited to names and contact information for employees .2 teleconference with Hunter Pyle, Katy Fiester and Darlene Sanchez re class cert and class judgment facts, status, and further activities 1.0 Prepare draft e-mail to clients detailing further activities on class motions; save, translate to Croatian, e-mail to clients .8 Review draft questionnaire, revise and save same .2	400.00/hr	960.00

Gregor Lesnik

Page 202

	<u>Rate</u>	<u>Amount</u>
3/14/2020 Update ISM Vuzem employees spreadsheet 8.	75.00/hr	600.00
e-mail from Papes re form of questionnaire, and e-mail addresses for class members .1	400.00/hr	40.00
3/15/2020 discuss with staff additions to Vuzem employee list .1	400.00/hr	40.00
3/16/2020 Additions to ISM Vuzem employees spreadsheet 1. Organize pleadings, discovery, and client documents 6.	75.00/hr	525.00
review text of, potential privacy concerns with, and machine translations of proposed e-mail and questionnaire .1 (partially charged)	400.00/hr	40.00
3/17/2020 Prepared letter to Titan .1	75.00/hr	7.50
Discuss with Elma and obtain translation of proposed e-mail and questionnaire .1 (partially charged) locate, save and review General Order 72 and 73 including amendments re Corona virus and operations and scheduling .1 (partially charged) locate and review e-mails from February from counsel who provided advise; evaluate other counsels arguments re trafficking; prepare memo re possible oral argument on motions for default judgment as to trafficking / coerced labor claim .3 Review and assist in adding to worker name and contacts list .1	400.00/hr	240.00
3/18/2020 Organizing and filing 1. Translate English to Croatia .4	75.00/hr	105.00
check delivery of motions and set up alerts on USPS.com process USB drive to Mr. Pyle via FedEx. .75	75.00/hr	56.25
review Tesla productions converted to pdf and made searchable, convert to pdf, save, make searchable, and re-save for the rest of the TIF documents .5 (level 3) e-mail to Elma to review and translate revised questionnaire .1 review and save final Croatian translation of questionnaire .1	400.00/hr	1,280.00

Gregor Lesnik

Page 203

	<u>Rate</u>	<u>Amount</u>
Review list of Eisenmann visas, highlight in bold names of management and owners		
.1 (partially charged)		
discuss and review updated Vuzem employee list now limited to Class members		
.2		
E-mail to clients re list and request for address, phone and e-mails		
.1		
E-mail from Papes, review attachment, save revisions to class member list		
.2		
Call to Pyle re final versions in English and Croatian of questionnaire and cover e-mail		
.1		
Review all Tesla and Eisenmann productions, prepare memo of what was required to be produced, what was produced and when		
.6		
Save all productions with memo to USB, fed ex to Pyle		
.2		
Memo re Pyle address		
.1		
E-mail from Pyle to Papes		
.1		
E-mail to Pyle class member spreadsheet with contact information, revise final e-mail, and revised final questionnaire translated into Croatian		
.1		
Research incentives, class representatives, and awards on class claims; locate sample class representative declarations; prepare draft for Papes Declaration		
1.0		
Discuss with staff tracking of deliveries of mail served pleadings, direct saving USPS tracking records, direct saving scanned custom forms		
.1		
Receive from Pyle exemplar e-mail to worker NZ		
.1		
3/19/2020 Completed organizing documents and filing		15.00
1.	75.00/hr	
copy WCD decl into word and clean up		56.25
.75	75.00/hr	
e-mails with Papes about his completing questionnaire		640.00
.1	400.00/hr	
E-mails with Papes about what workers are receiving questionnaires and from who		
.1		
E-mails with Lesnik about his completing questionnaire		
.1		
Review scanned customs declarations		
.1 (no charge)		
review e-mail from Lesnik with completed questionnaire, save, print		
.1		

Gregor Lesnik

Page 204

	<u>Rate</u>	<u>Amount</u>
E-mail to Lesnik about additional information for answering questionnaire .1		
E-mail of Papes to all counsel about workers mail, message and call about completing questionnaires; e-mail from Pyle .1		
E-mails with Pyle about translations using machine translations and then translator assistance .1		
Discuss with staff updates to contact information for Vuzem worker spreadsheet .1		
E-mails with Sanchez of Pyle firm about list of individuals receiving e-mails .1		
Review, revise and add to draft declaration in support of motion for default judgment .5		
Discuss with Elma translations and assist with background to assist with translations .1		
E-mails with Papes about status of sending cover e-mail and questionnaire to class members with recent e-mail addresses .1		
3/20/2020 copy Papes decl, motion for default judgement, proposed order and decl of Papes-class rep and atty fees into word and clean up 2.75	75.00/hr	206.25
Receive and review returned package from Vuzem USA - San Pedro, CA	400.00/hr	40.00
e-mail from Gregor Lesnik about needing bank statements and time documents, locate documents, e-mail to Gregor with hours, wages and contract documents, prior declaration, and filed complaints .2	400.00/hr	1,320.00
Review prior Papes e-mails, Prepare draft insert to Papes declaration as class representative identifying activities .1		
Locate facts and statements of worker ST, save, discuss with Papes which workers are most cooperative and which ones have privacy concerns .2		
Locate e-mails with Bernay, review text of Confidential Settlement Agreement, prepare memo re obligations of production and disclosure .2		
Prepare memo re confidential designations .1		
Review draft memos for e-mail and prepare detailed e-mail to attorney Bernay identifying productions by Eisenmann, obligation of production, what was not produced, and what is requested for compliance by Eisenmann with its obligations; print and save in pdf for exhibit to potential motion .4		
Begin to convert prior draft of combined class and individual wage motion for default judgment into class motion for default judgment		

Gregor Lesnik

Page 205

	<u>Rate</u>	<u>Amount</u>
.3 Begin to convert prior draft of combined class and individual wage declaration by Papes into declaration in support of class motion for default judgment		
.4 Begin to convert prior draft of proposed Order on combined class and individual wage motion into draft proposed Order on class motion for default judgment		
.2 Review Lesnik response to questionnaire, save into Word format and direct machine translation		
.1 E-mail from Papes of sending questionnaire to additional workers, with e-mail contact information		
.1 teleconference with Hunter Pyle, Katy Fiester and Darlene Sanchez re class cert and class judgment facts, status, and further activities		
1.0		
3/21/2020 E-mail from Papes of sending questionnaire to additional workers, with e-mail contact information	400.00/hr	480.00
.1 Call with Papes about co-workers with information and assistance with obtaining answers and declarations		
.3 call with co-worker RD, using Elma to interpret, memo of phone call		
.2 Call with co-worker SM, using Elma to interpret, memo of phone call		
.5 Discuss translations with Elma		
.1		
3/22/2020 multiple e-mails from Papes of sending questionnaire to additional workers, with e-mail contact information	400.00/hr	480.00
.1 Multiple e-mails from Pyle and his office of responses to questionnaires, assist downloading and saving		
.1 Locate and e-mail to Pyle of statements and declarations previously obtained from class members		
.1 Discuss with staff and assist with updating spreadsheet of class members with status of e-mails, responses, statements and calls		
.2 E-mail to Pyle with spreadsheet		
.1 E-mails with Darlene of Pyle office re receipts of responses to questionnaires		
.1 call with Class Member SM, memo to file		
.5		

Gregor Lesnik

Page 206

	<u>Rate</u>	<u>Amount</u>
3/23/2020 call to Darlene Sanchez re translating declarations, memo to file		307.50
.1	75.00/hr	
Translating declarations		
4.		
Multiple e-mails from Pyle and his office of responses to questionnaires, assist downloading and saving	400.00/hr	320.00
.1		
multiple e-mails from Papes of sending questionnaire to additional workers, with e-mail contact information, and other e-mails with new and additional phone numbers		
.1		
Discuss with staff updating spreadsheet; review notes of call with Pyle office re translations responsibilities		
.1		
E-mails with Pyle office and discuss with staff updating Dropbox information		
.1		
E-mail to Pyle office attaching updated spreadsheet and status of translations		
.1		
Receive e-mails and forwarded e-mails with responses to questionnaires, direct saving, machine translation, and printing for translations assistance		
.1 (partially charged)		
Discuss with staff and review receipt, saving, and translations of responses to questionnaires		
.1 (partially charged)		
save Dropbox information		
.1 (no charge)		
Discuss translations with Elma		
.1		
3/24/2020 Updating spreadsheet, translating Statements and Questionnaire		600.00
8.	75.00/hr	
update Papes decl		37.50
.5	75.00/hr	
multiple e-mails from Papes of sending questionnaire to additional workers, with e-mail contact information, and other e-mails with new and additional phone numbers	400.00/hr	920.00
.1		
e-mail from Pyle re issues for class cert motion		
.1		
Prepare memo for teleconference		
.1		
E-mail from Palmer attaching signed stipulated protective order, save attachment		
.1		
E-mail from Pyle forwarding questions from workers concerned that Vuzem dba HRID-Mont d.o.o. would retaliate if their cooperation was known		
.1		
E-mail to Pyle re implied requisite to class cert and using numbers to identify Class Member workers instead of their names		

Gregor Lesnik

Page 207

	<u>Rate</u>	<u>Amount</u>
.1 E-mail from Pyle re declaration for class representative, save format, add to Papes declaration as class representative, save, e-mail to Pyle		
1.5 Discuss with Elma translations		
.1 E-mail and call with Papes re some class members concerns about disclosure of names and contact information		
.1		
3/25/2020 Updating spreadsheet, translating Statements and Questionnaires		600.00
8. assist w machine translate	75.00/hr	
2	75.00/hr	150.00
assist staff in saving revisions to translations from Croatian into English, review status of saving revisions, uploading to Dropbox		480.00
.1 (partially charged) review revisions by Pyle to draft Papes declaration, review and revise draft declaration, e-mail to Pyle	400.00/hr	
.3 E-mail to Pyle re status of translations		
.1 Multiple e-mails with Pyle re history of Alameda pleadings, why Papes is class representative		
.3 Discuss translations into Croatian of portion of Papes declaration in common with other class member intended draft declarations		
.2 Discuss with Elma translations		
.1 E-mails with Stjepan, Danijel and Elma re specific translation questions		
.1		
3/26/2020 assist w machine translate and printing of documents		187.50
2.5	75.00/hr	
Translating questionnaires and statements, updating spreadsheets		525.00
7. review, and save, draft Papes declaration as translated into Croatian	75.00/hr	
.2 E-mails with Papes about his completing a questionnaire	400.00/hr	120.00
.1		
3/27/2020 assist w machine translate and printing of documents		393.75
5.25	75.00/hr	
Receive and review Titan Invoice SU331364-0101		NO CHARGE
	400.00/hr	

Gregor Lesnik

Page 208

	<u>Rate</u>	<u>Amount</u>
3/27/2020 discuss with staff revisions of translations of answers to questionnaires into English .2 (partially charged) locate documents to attach as Exhibits to e-mail to attorney Bernay re incomplete Eisenmann productions, save to pdf for attachment .1 Detailed e-mail to Bernay of facts of meet and confer, identified documents from Plaintiffs Rule 26 production of Eisenmann knowledge, possession and failure to produce identification of workers, identification of contracts, and records relevant to motions .6 E-mail from Bernay stating Eisenmann production - not responding to omissions .1 teleconference with Hunter Pyle, Katy Fiester and Darlene Sanchez re class cert and class judgment facts, status, and further activities 1.0 E-mail to Papes of update draft declaration in both English and Croatian .2	400.00/hr	880.00
3/29/2020 e-mail from Papes with revisions and additions to draft declaration; save, review .2 Discuss with Elma translations; save revisions to declaration of Papes .1	400.00/hr	120.00
3/30/2020 assist w machine translate, entering edits and organizing of statements and questionnaires 4.75	75.00/hr	356.25
Translating questionnaires and statements, updating spreadsheets 8	75.00/hr	600.00
discuss with staff status of translations of questionnaires .2 upload to Drop Box revised Croatian translations of questionnaires .2	400.00/hr	160.00
discuss with staff status of translations of questionnaires .2 (partially charged) upload to Drop Box revised Croatian translations of questionnaires .2 E-mail to Pyle good English and Croatian versions of draft declarations for co-workers; and English and Croatian versions of Papes declaration .2 Call to Pyle re status of translations of draft shell declarations .1 Direct updates to worker spreadsheet .1 E-mail with Pyle re time period of workers at Tesla .1 E-mails with Pyle re translation of Papes terms, and omitted or unclear	400.00/hr	440.00

Gregor Lesnik

Page 209

		<u>Rate</u>	<u>Amount</u>
	meaning of declaration .2		
3/31/2020	Translating questionnaires and statements, updating spreadsheets 7.	75.00/hr	300.00
	assist w machine translate, entering edits and organizing of statements and questionnaires .1	75.00/hr	7.50
	discuss with staff translations .1	400.00/hr	280.00
	E-mail from Pyle re reminder e-mail, calls and e-mails to translators, e-mail from Elma, e-mail to Pyle .2		
	E-mail from Pyle re phone calls with workers, e-mail to Pyle, e-mail to clients .1		
	Discuss saving return receipts for service of motions for judgment .1		
	E-mails about scheduling calls between interpreter Radmilo Bozinovic and workers .1		
	E-mails with Pyle and staff about mass e-mailing of reminder to co-workers .1		
4/1/2020	Translating questionnaires and statements, updating spreadsheets, uploading to dropbox 6.	75.00/hr	450.00
	Create spreadsheet, locating workers for Class Action 3.	75.00/hr	225.00
	discuss with staff translations .1	400.00/hr	600.00
	Discuss with staff excel spreadsheet of status of questionnaires and declarations .1		
	E-mail to Pyle and staff re status .1		
	Call with Pyle re calls by interpreter and scheduling same, clean supported class claims, worker / employee list, and numbers of workers per day spreadsheet phone calls with workers, e-mail to Pyle, e-mail to clients; memo to file .4		
	Discussions with staff updating worker list, and preparing spreadsheet of workers per day; review notes and documents, prepare memo re source of information, discuss preparation of declaration explaining methodology .5		
	E-mails from and to Pyle's staff re language on reminder e-mail .1		
	E-mails with Papes about scheduling calls with co-workers .1		

Gregor Lesnik

Page 210

	<u>Rate</u>	<u>Amount</u>
E-mails with Pyle and staff about revisions to e-mail message to co-workers .1		
4/1/2020 discuss with staff translations .1	400.00/hr	520.00
Discuss with staff excel spreadsheet of status of questionnaires and declarations .1		
E-mail to Pyle and staff re status .1		
Call with Pyle re calls by interpreter and scheduling same, clean supported class claims, worker / employee list, and numbers of workers per day spreadsheet phone calls with workers, e-mail to Pyle, e-mail to clients; memo to file .4		
Discussions with staff updating worker list, and preparing spreadsheet of workers per day; review notes and documents, prepare memo re source of information, discuss preparation of declaration explaining methodology .5		
E-mails from and to Pyles staff re language on reminder e-mail .1		
4/2/2020 Translating questionnaires and statements, updating spreadsheets, uploading to dropbox 1.	75.00/hr	600.00
Worked on Methodology and spreadsheet 7.		
texts to and call with Stjepan Papes re scheduling telephone calls with interpreter Radmilo Bozinovic and re case status, common class issues, and timing of all motions .6	400.00/hr	400.00
Discuss with staff preparation of memo of methodology of counting workers per day .1		
E-mail to Stjepan re scheduling telephone calls .2		
Discuss with staff updates on questionnaires and translations .1		
texts to and call with Stjepan Papes re scheduling telephone calls with interpreter Radmilo Bozinovic and re case status, common class issues, and timing of all motions .6	400.00/hr	400.00
Discuss with staff preparation of memo of methodology of counting workers per day .1		
E-mail to Stjepan re scheduling telephone calls .2		
Discuss with staff updates on questionnaires and translations .1		

Gregor Lesnik

Page 211

	<u>Rate</u>	<u>Amount</u>
4/3/2020 Translating questionnaires and statements, updating spreadsheets, uploading to dropbox Class Action case 8	75.00/hr	600.00
teleconference with Hunter Pyle, Katy Fiester and Darlene Sanchez re class cert and class judgment facts, status, and further activities 1.0	400.00/hr	400.00
texts and e-mails to and from staff re worker spreadsheets for class action judgment .1	400.00/hr	320.00
Conference call with Hunter Pyle, Katy Fiester and Darlene Sanchez re class action certification and judgment motions including status of questionnaires, declarations, worker per day spreadsheets, and available class damages .6		
Memo re further activities .1		
texts and e-mails to and from staff re worker spreadsheets for class action judgment .1	400.00/hr	280.00
Conference call re class action certification and judgment motions including status of questionnaires, declarations, worker per day spreadsheets, and available class damages .6		
4/4/2020 Class Action Copy data from Tesla spreadsheets and sort for count of workers, Create new spreadsheets, eliminate duplicates for each day working at Tesla 8	75.00/hr	600.00
review notes re class action motions .2	400.00/hr	160.00
Prepare outline for declaration .2		
review notes re class action motions .2	400.00/hr	80.00
4/5/2020 Continued working on Spreadsheets 8	75.00/hr	600.00
review co-worker e-mails forwarded from Darlene Sanchez .1	400.00/hr	280.00
Prepare in Croatian explanation reply e-mail to co-workers .1		
E-mails to Pejic and to Dizdarevic .1		
Review draft of and revise declaration re methodology .2		
Review status of forwarding e-mails to staff of questionnaires and e-mails		

Gregor Lesnik

Page 212

		<u>Rate</u>	<u>Amount</u>
	from co-workers .2		
4/5/2020	review co-worker e-mails forwarded from Darlene Sanchez .1 Prepare in Croatian explanation reply e-mail to co-workers .1 E-mails to Pejic and to Dizdarevic .1 Review draft of and revise declaration re methodology .2 Review status of forwarding e-mails to staff of questionnaires and e-mails from co-workers .2	400.00/hr	280.00
4/6/2020	Translating Statements and Questionnaires, and continued working on Class Action 8	75.00/hr	600.00
	receive e-mails of questionnaires, forward to staff, e-mail from staff that no prior receipt of some, receive draft translations, save, forward for translations answers in Croatian and draft translations .4 Discuss with Elma and assist in explaining translations .1 Add to Dresser Declaration in support of motion for class certification re methodology .5 Detailed review of omissions, gaps and relationships in Tesla entry logs for identifying numbers of workers, dates of entry, and creating spreadsheets to calculate worker days 2.0	400.00/hr	1,200.00
	receive e-mails of questionnaires, forward to staff, e-mail from staff that no prior receipt of some, receive draft translations, save, forward for translations answers in Croatian and draft translations .4	400.00/hr	160.00
4/7/2020	Translating Statements and Questionnaires, and continued working on Class Action 8	75.00/hr	600.00
	Receive and review returned from HRID-Mont, d.o.o. tracking CH093633379US-default motion returned from Vuzem San Pedro-amended POS	400.00/hr	40.00
4/8/2020	Translating Statements and Questionnaires, and continued working on Class Action 8	75.00/hr	600.00

Gregor Lesnik

Page 213

		<u>Rate</u>	<u>Amount</u>
4/9/2020	Translating Statements and Questionnaires, and continued working on Class Action 8	75.00/hr	600.00
	e-mail from Pyle re directions for docuSign .1	400.00/hr	320.00
	machine translate and e-mails to obtain assistance in translating into Croatian directions for docuSign .2		
	Receive e-mail responses from Danijel and from Elma .1		
	Review questionnaire responses, translations, and saving originals, Word versions of Croatian responses and Word versions of English translations .2 (partially charged)		
	e-mail to Pyle re status .1		
	E-mails with attorney Foran about missing and omitted data from Tesla production .1		
4/10/2020	Continued work on Class Action case, declaration and spreadsheets 5.5	75.00/hr	412.50
	teleconference with Hunter Pyle, Katy Fiester re: status of the class list; status of the data analysis re number of CMs who worked per day; and the motion for judgment and how it ties in to the motion for class cert .8	400.00/hr	320.00
4/11/2020	Continued work on Class Action case, declaration and spreadsheets, class action list of employees 6	75.00/hr	450.00
4/12/2020	Continued work on Class Action case and spreadsheets 4.	75.00/hr	300.00
4/13/2020	Continued work on Class Action case and spreadsheets 8	75.00/hr	600.00
	discuss with staff completion of class member list .1	400.00/hr	1,360.00
	Discuss with staff further work, status, and goal of worker per day spreadsheet .2		
	Review omitted information, gate entries, worker entry dates and skips, and calculation of worker days and calculation of pay periods 1.0		
	Call with Papes about worker dates .1		
	Add to declaration in support of class certification motion re revisions to methodology based on further reviews of data 1.0		
	Prepare insert to ddd to declaration in support of class certification motion		

Gregor Lesnik

Page 214

		<u>Rate</u>	<u>Amount</u>
	facts re tolling 1.0		
4/13/2020	-review class workers spreadsheet .3	75.00/hr	22.50
	copy data form tesla spreadsheet 001 and sort for workers assignment dates 6	75.00/hr	450.00
4/14/2020	Continued work on Class Action case and spreadsheets 8	75.00/hr	600.00
	discuss with staff questions about preparing Class Member List .1	400.00/hr	1,120.00
	Discuss with staff preparing spreadsheet of worker days 1.0		
	Memo to file for call with Pyle re class members, worker days, and pay periods; save .4		
	E-mail to Pyle .1		
	Responsive e-mail from Pyle re issues about facts .1		
	E-mail to Foran identifying by date missing Tesla data .2		
	E-mails from and to Foran re Tesla response to request for complete production .1		
	Update draft declaration re methodology .7		
	Locate and e-mail to Pyle filed pleadings in Alameda County action .1		
	copy data form tesla spreadsheet 001 and sort for workers assignment dates 6.5	75.00/hr	487.50
4/15/2020	Continued work on Class Action case and spreadsheets 8	75.00/hr	600.00
	discuss with staff, and review information for and memo re workers at Tesla omitted from entry logs, names on Tesla data who are supervisors, or not Vuzern employees and thus not Class Members 1.0	400.00/hr	1,520.00
	Prepare draft E-mail to clients in English and translate into Croatian questions about Class Members; e-mail to clients .3		
	E-mails with Pyle and Fiester re damages analysis; save spreadsheet, discuss with staff information to complete damages calculations .2		
	E-mail from Papes, review notes re Tesla data .2		
	Followup clarifying e-mail to Papes, e-mail from Papes after calls with other		

Gregor Lesnik

Page 215

		<u>Rate</u>	<u>Amount</u>
	workers		
	.1		
	Call with Papes		
	.1		
	Discuss and assist with preparing draft work days by week, name and date of worker entries, names on Tesla entries who are not Class Members		
	1.0		
	E-mail from Pyle re information and draft for declaration in support of class cert, save, review		
	.2		
	Locate and e-mail to Pyle of examples of motions for judgment and proposed Orders issued in 9th Circuit and ND California		
	.2		
	Locate and e-mail to Pyle of examples of class cert and on fees and representative compensations		
	.1		
	Locate and e-mail to Pyle prior filed motions and proposed Order on motions for default judgment including for wage and hour claims		
	.1		
	Discuss revised work days spreadsheet, issues for incompletely counted or omitted counts for non-supervisor entries		
	.2		
	Direct additions for days and weeks for spreadsheets		
	.1 (partially charged)		
4/16/2020	Discuss revised work days spreadsheet, issues for incompletely counted or omitted counts for non-supervisor entries	400.00/hr	1,520.00
	.2		
	Prepare spreadsheet of Vuzem employees at Tesla who are not on entry logs; save, e-mail to Papes and to other class members for information and response		
	.3		
	E-mail from Papes		
	.1		
	Calls with Papes		
	.1		
	Locate and save documents for exhibits for Declaration in support of class certification; prepare draft identification for declaration for class cert		
	.8		
	Prepare drafts for additions to declaration for class cert		
	1.5		
	Call Papes re phone call from interpreter		
	.1		
	E-mail to Gregor and Stjepan and to Fiester		
	.1		
	E-mails with Pyle re duration of trips to and from Tesla, and what was involved		
	.2		
	E-mail with Pyle translating question from worker GH about documents that he does not have at his home		
	.1		
	E-mail to Papes forwarding questions about Pyle about exhibits to declaration, locate and attach pay record exhibits		

Gregor Lesnik

Page 216

		<u>Rate</u>	<u>Amount</u>
	.1 E-mails with Pyle about defendants and about defining class		
	.1 E-mail to Pyle attaching all declarations and questionnaires by Papes and Lesnik		
	.1		
4/16/2020	copy data form tesla spreadsheet 001462 and sort for workers assignment dates 6.7	75.00/hr	502.50
4/17/2020	e-mail from Pyle, calls to Papes and to Lesnik re call from interpreter and issues that may be discussed to ensure included in declaration, e-mail to Pyle .4 e-mail from and to Fiester re phone apps to contact workers .1 Prepare drafts for additions to declaration for class cert 1.5 Review and revise with additions to draft MPA for class judgment .6 teleconference with Hunter Pyle, Katy Fiester .5 E-mail to Class Member ID re Vuzem workers at Tesla and time period of assignments .2 Discuss with staff and add to memo about missing Tesla data .5 Review known Vuzem workers at Tesla with omitted Tesla data, memo re same .2 Discuss and direct Class Member List with assigned numbers .1 E-mail list to clients to discuss with other co-workers complete list .1 Add to declaration re tolling, case history, attorney background, and information re Class Members, Total Worker Days, and Pay Periods 3.0 Research legislative history for applicable minimum wage, memo to file .1 E-mail to Pyle re substantive notes for motion .1 E-mail to Papes re irregular and skips for entry data for some workers .1	400.00/hr	3,000.00
	assist with assigning numbers to class members, calculate pay periods, cross reference possible workers with known workers 6.6	75.00/hr	495.00
4/19/2020	e-mail to Fiester of applicable minimum wage and legislative history .1 discuss assignment of worker numbers, and accuracy of names of living and deceased class members based on conversations and e-mails with clients	400.00/hr	2,000.00

Gregor Lesnik

Page 217

	<u>Rate</u>	<u>Amount</u>
and co-workers		
.2		
Discuss and review badge scan issues for completing spreadsheets		
1.0		
Review revised class list with assigned numbers in lieu of names		
.1		
E-mails from Pyle re applicable standards under California law, locate 9th Circuit decisions citing authority, review same, memo to file		
.3		
Add to and revise motion for judgment for class claims		
1.5		
save draft motion in Word, direct revisions to formatting and to Tables		
.2		
Add to and revise draft Declaration, revisions to formatting		
1.0		
Discuss translations with Elma		
.1		
E-mail to Foran about Tesla confidentiality designations		
.1		
E-mail to Foran about omitted Tesla data by dates and by workers and added workers by Tesla for non-Vuzem / Gregurec employees and management		
.3		
E-mail to Pyle of most recent work in progress Declarations and MPA		
.1		
4/19/2020 cross check mid dec 2014 through march for who worked at tesla- update formatting for WCD dec and MPA WCD	75.00/hr	431.25
5.75		
4/20/2020 Receive and review returned mail from Branko Tomas- Las Vegas	400.00/hr	40.00
review status of questionnaires, update spreadsheet		
.1	400.00/hr	2,680.00
Review employee list, contact list, and completed Class Member list		
.2		
E-mail to Papes, Lesnik and Danijel attaching Class Member List		
.1		
Locate time records submitted by Vuzem to Eisenmann, save in pdf		
.2		
e-mail to attorney Bernay with copy to attorney Foran of missing information and intent to file motion to enforce settlement agreement absent production by Eisenmann		
.7		
Call to Bernay		
.1		
Call to Foran		
.1		
Call to Maslic, text from Maslic about dates worked		
.1		
Call to Papes, text from Papes about dates worked		
.1		

Gregor Lesnik

Page 218

		<u>Rate</u>	<u>Amount</u>
	E-mails to and from Papes re his call with Class Member ID about class member list		
	.1		
	Review, revise and complete spreadsheets of Class Members, Worker Days, and two alternatives for Pay Periods by Worker Days and by Tesla incomplete data		
	2.0		
	E-mail from Pyle of revisions to Declaration in track changes; Review, revise, and add to Dresser Declaration for Class Cert		
	2.0		
	Locate and save exhibits for WCD Declaration, save with exhibit identifications		
	.3		
	Review formatting for spreadsheets, save to pdf with headers and footers and descriptions		
	.4		
	Call with Papes; e-mail from Papes of his review of notes		
	.2		
	E-mail to Bernay identifying who from Vuzern gave timesheets to who at Tesla		
	.1		
4/20/2020	identify class list, pay statement violations, update WCD dec.		401.25
	5.35	75.00/hr	
4/21/2020	revise and update Declaration in support of class cert		1,200.00
	1.0	400.00/hr	
	Direct redactions to exhibits to remove names of Class Members		
	.4 (partially charged)		
	prepare proofs of service for motion for class cert, and motion for judgment on class claims		
	.3		
	Review Pyle drafts for MPA, save, revise broadly draft MPA		
	.3		
	call with Hunter Pyle re class members, number of worker days, number of pay periods, tolling, notice of dismissal, and further work required for declarations and for motions		
	1.0		
	revise and update Declaration in support of class cert		3,960.00
	1.0	400.00/hr	
	Direct redactions to exhibits to remove names of Class Members		
	.4 (partially charged)		
	prepare proofs of service for motion for class cert, and motion for judgment on class claims		
	.3		
	Review Pyle drafts for MPA, save, revise broadly draft MPA		
	.3		
	call with Hunter Pyle re class members, number of worker days, number of pay periods, tolling, notice of dismissal, and further work required for declarations and for motions		
	1.0		
	Review Pyle e-mail and memo re Eitl issues for default judgment		

Gregor Lesnik

Page 219

	<u>Rate</u>	<u>Amount</u>
.1 Discuss with Pyle his taking lead on completing all MPA		
.2 Memo of docs for filing motions, prepare draft proofs of service		
.3 E-mail to Pyle drafts of MPA, Proof of Services, proposed Orders		
.1 discuss with Pyle alter ego issues		
.1 Review Third AC, sort out allegations, review drafts of MPA for default judgment, e-mail to Pyle of allegations of Third Amended Complaint and shell of key facts for alter ego liability		
1.0 E-mail from attorney Bernay, open documents from link, save documents, review visa and contract records		
1.0 research re alter ego liability under 9th Circuit and ND analysis, save research, prepare memo re standards		
2.0 E-mail from Pyle of his researched authorities		
.1 Prepare draft insert to MPA for judgment re alter ego		
1.3 E-mail to Pyle		
.1 E-mail with Fiester re calculations		
.1 Discuss with staff redactions of names and replacing with Class Member numbers and re-saving exhibits in pdf		
.3 (partially charged) review and revise methodology for calculations		
.2		
4/21/2020 update WCD Decl exhibits with number instead of name and insert footers, update class member pay statements spreadsheet	75.00/hr	450.00
6		
4/22/2020 discuss with staff entry of data for History Report for Court		2,200.00
.3 (no charge)	400.00/hr	
discuss with staff saving exhibits, identifying in text, exhibit numbering		
.2 Review documents re alter ego liability, locate and save in pdf HRID-Mont, d.o.o. pay records for Class Member GR, call to Papes about source of documents, receive e-mail from and call with Papes re source, locate declaration of GR referring to work for HRID-Mont d.o.o.		
1.0 Call with Pyle about alter ego inserts		
.1 Call with Pyle about time records for declaration to support fees		
.1 Discuss with staff finalizing pdf of Exhibits for declaration, naming of same, and forwarding information to attorney Pyles office		

Gregor Lesnik

Page 220

		<u>Rate</u>	<u>Amount</u>
	.1 (partially charged) Review, revise and add to Dresser Declaration for Class Cert, and for Judgment 4.0		
4/22/2020	end of day, revise inserts re alter ego for MPA in support of motion for class cert 1.0 Revise draft Decl in support of motion for class cert to refer to evidence in declaration and prior filings on alter ego contention 1.0 Complete draft of Dresser Decl in support of motion for judgment on class claims and for attorneys fees 4.0 Prepare final list of all exhibits .2 Prepare draft Notice of Appearance for Pyle .2 E-mail and memo to Hunter Pyle re documents for class cert and for judgment .2	400.00/hr	2,640.00
	update WCD Decl exhibits with footers, and exhibit list for Decl., update formatting for 2 of WCD decls, send exhibits and list to attys Pyle, add text for history/attorney fees to decl support judgement 5.45	75.00/hr	408.75
4/23/2020	be available for and respond to multiple phone and e-mail inquiries by Pyle and office, revise citations to evidence on decl and MPA for class judgment on alter ego allegations, identify proof of Direktors, locate and forward pleadings, locate and forward exhibits to declarations; review and approve revisions to declarations in support of cert and in support of motion for Class judgment with add ons 5.0 (partially charged) receive, download and save motion for class certification and class counsel .1 Review filed copy of motion .2 Print copies for service .1 (partially charged) E-mail to clients .1 Receive e-filing notification for motion for judgment on Class claims .1	400.00/hr	2,640.00
	prepare custom forms, filing of plds, billing 2.85	75.00/hr	213.75
4/24/2020	call from Pyle re filing coding error .1 Receive e-notice of revised filing of motion for Class judgment .1	400.00/hr	760.00

Gregor Lesnik

Page 222

	<u>Rate</u>	<u>Amount</u>
4/30/2020 e-mail from Pyle, and e-mail to Pyle, and e-mail to client re fees and invoice .2 (no charge) call to and e-mail from Pyle re proposed Orders .1 E-mails with Bozinovic .1	400.00/hr	80.00
5/1/2020 e-mail to Pyle re form of proposed Orders .1 E-mails with Pyle re proposed Orders .1	400.00/hr	80.00
5/4/2020 tracking of packages .3	75.00/hr	382.50
locate Orders for Default Judgment and Judgments, evaluate style and procedure, call to and e-mails with Hunter Pyle .4	400.00/hr	160.00
5/8/2020 tracking packages via usps.com- final class docs .1	75.00/hr	7.50
5/11/2020 tracking packages via usps.com- final class docs .1	75.00/hr	7.50
5/12/2020 Receive and review returned from Mos servis d.o.o.	400.00/hr	40.00
5/18/2020 tracking of international packages- motions and saving to file .1	75.00/hr	7.50
5/21/2020 Receive and review returned motion-default judgement from Magna d.o.o	400.00/hr	40.00
5/27/2020 review local rules of court and COVID-19 General Orders, save .1 E-mail to Hunter Pyle re hearings and anticipated procedure .2	400.00/hr	120.00
5/28/2020 receive e-notification of vacating hearing on motion for class certification, save, print, revise calendar, e-mail to attorney Hunter .2 Receive e-mail and proposed Orders sent to Judge Koh, e-mails with staff to obtain copies to save .1	400.00/hr	120.00
5/29/2020 receive and save Notice of Withdrawal of Counsel, Administrative Motion to replace counsel; print same .1 e-mail to Pyle re reason for Quyen Ta withdrawal as counsel .1	400.00/hr	120.00

Gregor Lesnik

Page 223

	<u>Rate</u>	<u>Amount</u>
e-mails with Hunter Pyle about scheduling phone call .1		
6/2/2020 save e-mails of past week .1	400.00/hr	80.00
Receive e-notice of, download, save and print notifications of changes in handling defense counsel .1		
6/8/2020 Receive and review Letter from Poland	400.00/hr	40.00
6/9/2020 e-mail from Papes .1	400.00/hr	40.00
6/10/2020 e-mail to clients re status and calendered further activities .1	400.00/hr	40.00
6/15/2020 e-mail from attorney Pyle, e-mail to Radmilo Bozinovic, issue check, prepare letter .3	400.00/hr	120.00
6/16/2020 Call from Titan, memo to file .1	75.00/hr	7.50
6/24/2020 Receive and review Returned motion for class certification from Ivan Vuzem	400.00/hr	40.00
6/25/2020 receive order vacating hearing dates, forward to clients .1	400.00/hr	40.00
receive e-notice of Order denying without prejudice motions for default judgments and for class certification, review .1	400.00/hr	80.00
E-mail to clients .1		
6/28/2020 e-mail from and to Stjepan Papes .1	400.00/hr	40.00
6/29/2020 e-mail from and to Pyle re court order on motions for default and for certification .1	400.00/hr	40.00
Receive and review Returned Class docs from ISDM Vuzem d.o.o. Returned Mtn for Default Judgement from HIRD-Mont d.o.o.	400.00/hr	40.00
7/2/2020 e-mail from Pyle re teleconference / zoom, e-mail to Pyle re scheduling .1	400.00/hr	240.00
download, save, Order deny without prejudice motions for default judgment and for class cert		

Gregor Lesnik

Page 224

	<u>Rate</u>	<u>Amount</u>
.1 Review FRCP Rule 4; Hague Convention on Service; Croatia adoption of Convention and notifications; Slovenia adoption of Convention and notifications; save all in pdf		
.3 Call with Hunter Pyle		
.1		
7/3/2020 Receive and review Final class docs returned from R Vuzem	400.00/hr	40.00
7/19/2020 begin to prepare Dresser Declaration in support of First Amended Motions for Default Judgments by locating and identifying proofs of service and requests for entries of default, and inserting applicable facts	400.00/hr	680.00
1.5 Evaluate laws to be judicially noticed and how to authenticate		
.2		
7/23/2020 discuss with staff preparation of further amended motions		80.00
.2	400.00/hr	
7/25/2020 e-mail to attorney Pyle		40.00
.1	400.00/hr	
7/26/2020 e-mail from attorney Pyle		440.00
.1 Review Order, prepare list of revisions and additions to make to initial motions for default judgments	400.00/hr	
1.0		
7/27/2020 Download and saved pleadings to server, email to Darlene Sanchez requesting pleadings in Word format	75.00/hr	15.00
.2		
e-mail from Pyle law, direct saving, identifying documents we do not have in Word, direct e-mail to Darlene at Pyle Law	400.00/hr	80.00
.2		
7/28/2020 download Pleadings from Darlene		7.50
.1	75.00/hr	
discuss with staff saving word format of motions		40.00
.1	400.00/hr	
7/29/2020 evaluate e-mail to process server in Slovenian, and drafts of potential declarations	400.00/hr	160.00
.3		
Discuss translation of Slovenian with Bosnian translator		
.1		

Gregor Lesnik

Page 225

	<u>Rate</u>	<u>Amount</u>
7/30/2020 determine what additional pleadings are required for amended motions, save drafts from initial motions, discuss with staff converting to pleadings supporting second motions .3 Prepare initial draft of declaration for Odvetnik Divjak re Slovenian law on service, on effect of foreign judgments, and on completed service of process 3.2 Discuss with staff additions to declaration of Divjak .2 Review translations of Slovenian statutes .2 Call with Travancic re hiring of Odvetnik Divjak, and translations into Slovenian and from Slovenian into English .2 E-mail to clients re obtaining declaration regarding service .1 E-mail to Divjak .1	400.00/hr	1,720.00
7/31/2020 discuss with staff revising motions for further hearing and motions .2 Locate contact information for and send e-mail to Odvetnik Luka Divjak re declaration about service .1 E-mail from Odvetnik Divjak .1 E-mail to Divjak .1 E-mails with Papes re declarations .1 Reformatting pleadings into word 2	400.00/hr 75.00/hr	240.00 150.00
8/1/2020 locate and save to an exhibits folder e-mails re service .2 Evaluate service for personal jurisdiction .5 E-mail to clients of draft declarations re service .1	400.00/hr	320.00
8/2/2020 review e-mails with clients .1 (partially charged)	400.00/hr	40.00
8/3/2020 Reformatting pleadings into word 2.2 e-mails from and to Odvetnik Luka Divjak re Order, FRCP, and Declaration .2 Wire funds to Divjak, e-mail to Divjak .2 (no charge) add to and revise draft MPA in support of motion for default on wages claims,	75.00/hr 400.00/hr	165.00 280.00

Gregor Lesnik

Page 226

		<u>Rate</u>	<u>Amount</u>
	causes of action 2 and 3 .5		
8/4/2020	Reformatting pleadings into word 1.9	75.00/hr	142.50
	discuss with staff revisions to draft first amended motions for default judgments .3 (partially charged) prepare very initial draft of declaration of Croatian notary public Nada Sagi-Belcar .2 Add to and revise draft amended motion for default on coerced labor claims, causes of action 9 and 10 .5	400.00/hr	400.00
8/5/2020	Reformatting pleadings into word- motions draft CA wages C of A 1, 2-3, 4-8, 9-10 PropOrder Coerced Labor, FCA, Wages 4.3	75.00/hr	322.50
	locate with assistance of staff digital copies of proofs of service, locate translations, save to folder for preparing amended motion .2 (partially charged) e-mail from Odvetnik Luka Divjak, review downloaded declaration and attachments .2 E-mail to Divjak of minor revisions to declaration .1 Locate Belcar service in Croatia on We-Kr, d.o.o.; save for exhibits to draft declaration, enhance, machine translate same; format to match Croatian proof of service .7 (partially charged) Review changes in Word to draft default motion on FCA .2 Direct revisions in Word to proposed Orders granting Judgment on motions for default; discuss and revise initial drafts .1 (partially charged) Review with staff memo of to dos for amended motions for default judgments .1 Prepare initial draft declaration of Bozinovic .4 Review draft RJN in support of amended motions for default judgments .1 E-mails to and from Pyle re scheduling .1 (no charge) e-mail to Bozinovic .1 Review Congressional Research Manual re trafficking .3 Review and update to do list for preparing further / amended motions for	400.00/hr	1,120.00

Gregor Lesnik

Page 227

		<u>Rate</u>	<u>Amount</u>
	entry of default judgments .3		
8/6/2020	e-mail from Odvetnik Luka Divjak, download and save revised declaration .1	400.00/hr	2,440.00
	E-mails with Hunter Pyle and Radmilo Bozinovic about further activities .1		
	Locate information about Croatian service statutes, review in Croatian and English, save versions available on internet, copy and summarize portions in memoranda 2.0		
	Save EU and European Justice website articles and confirmation of adoption of Hague Convention .1		
	E-mails to and from and Call with Stjepan Papes .3		
	Prepare revised draft declaration of Croatian notary public Nada Sagi-Belcar 1.2		
	Research re service of process abroad, save article, save Water Splash v Menon opinion .2		
	Prepare memo of overview of service in Croatia .2		
	Draft inserts for Sagi-Belcar declaration; Add to draft declaration for Nada Sagi-Belcar, revise same; identify exhibits to draft declaration 1.0		
	E-mail to Sagi-Belcar .2		
	E-mail to Papes .1		
	Discuss with staff locating and saving translations from Slovenian into English of proofs of service .1 (partially charged)		
	E-mails to and from Sagi-Belcar, Pyle, Papes, Divjak, and Bozinovic re declarations and translations .4		
	Review Word copies of POS on foreign entities .1		
8/7/2020	Draft mtn default FCA work on clean up 3.25	75.00/hr	243.75
	e-mail from Papes .1	400.00/hr	3,440.00
	Review cited authority in e-mail, attempt to download Croatian statutes 1.0		
	Review Order directing amended motions for default .1		
	Review and excerpt portions of courts orders on motions to dismiss .2		
	Review all Federal Rules of Civil Procedure for applicability to all aspects of pleading, service, motions, judicial notice and service; bookmark FRCP		

Gregor Lesnik

Page 228

		<u>Rate</u>	<u>Amount</u>
1.5	Review authorities re service		
.2	memos re service, RJN, personal jurisdiction, minimum contacts, subject matter jurisdiction and judgment		
.7	revise argumentative headings on first amended motion for default - FCA, review authorities re personal service, review prior analysis is CMC statements, in research memos, and in draft inserts		
.5	revise and add to amended motion concerning personal jurisdiction, venue, subject matter jurisdiction, and Eitel factors		
3.0	Call with Papes		
.3	Locate Croatian statutes, save in print screen format, re-save in pdf, translate into English, save all copies		
.3	Zoom meeting with Hunter Pyle and Katherine Pfeister		
.4	Locate case authority for qualifications of Bozinovic		
.1	Attempted Call to and e-mail to Radmilo Bozinovic about further activities; memo to file		
.1	Discuss revisions to motion for default judgment on FCA		
.1			
8/8/2020	review draft declaration of Belcar		160.00
.1	Memo re to dos for factual background and legal issues to evaluate	400.00/hr	
.3			
8/9/2020	review e-mails with Odvetnik Luka Divjak		40.00
.1		400.00/hr	
8/11/2020	e-mail from Nada Sagi-Belcar		80.00
.1	save proposed Belcar declaration	400.00/hr	
.1			
8/12/2020	Translate declaration		30.00
.4		75.00/hr	
	e-mail from, and call with Stjepan		640.00
.3	Review e-mails from Papes, Nada Sagi-Belcar, Pyle, Bozinovic, and Bojic re declaration for service in Croatia	400.00/hr	
.4	Direct translation of proofs of service, assist with locating same, assist with naming as exhibits		
.2			

Gregor Lesnik

Page 229

	<u>Rate</u>	<u>Amount</u>
E-mails with Papes and with Bojic .1		
Translation of draft Belcar declaration .1		
E-mail to Sagi-Belcar .1		
Research application of California wage law on issues for subject matter jurisdiction, memo to file .4		
8/13/2020 Locate Proofs of Service both translated and originals and prepare for Exhibits 3.	75.00/hr	225.00
review translated proofs of service, save for declaration of Bozinovic, save original proofs of service .2	400.00/hr	1,400.00
e-mail from Bojic .1		
E-mail from Papes .1		
Call with Bozinovic .3		
Review and revise Bozinovic declaration .2		
Direct saving of proofs of services .1		
Locate and save Decl of Divjak, save exhibits .1		
Prepare to file Divjak declaration .2		
Direct staff in preparation of exhibit cover pages .1		
Locate Notary statutes, save in Croatian, translate into English, review website to obtain, search for any official or unofficial English translation; save for exhibits 1.0		
Revise draft declaration of Sagi-Belcar .4		
Prepare draft declaration of Bojic .4		
E-mail to Bojic .1		
E-mail to Bozinovic .1		
E-mail from Polish Minister for International Cooperation and Human Rights responding to e-mail of July 30, 2019 re service .1		
8/14/2020 e-mail from Bojic .1	400.00/hr	200.00
E-mails from Papes		

Gregor Lesnik

Page 230

	<u>Rate</u>	<u>Amount</u>
.1 Review and translate forwarded e-mail from Nada Sagi-Belcar		
.1 Evaluate Declaration to identify all services and all notices to all defendants		
.2		
8/15/2020 review declarations of Divjak and draft by Nada Sagi-Belcar; review and revise Request for Judicial Notice, locate and save in pdf applicable laws, complete and save for filing Request for Judicial Notice	400.00/hr	3,720.00
1.5 Add to Dresser Declaration		
1.0 Add conspiracy facts to amended FCA motion		
.4 Review MPA for FCA judgment for facts regarding service		
.2 Research Squibb decision and application to jurisdiction, locate orders finding service complete in England, review saved laws, add to MPA in support of judgments on FCA		
1.0 Add to Dresser Declaration to state further facts re filings, translations, service, defaults		
1.0 Clean up naming of documents in text and attachments to Request for Judicial Notice, complete, and combine exhibits for, Request for Judicial Notice		
.4 Memo re status of motions		
.1 Memo to locate references to Gregurec		
.1 Locate references to Gregurec in Ex. 374 and 375		
.1 Review MPA for needed additions and completions of cites to evidence		
.5 Review Declaration for needed additions to exhibits; locate and save as exhibits translations, compare translations to confirm same		
.3 Add to draft declaration		
.1 Organize exhibits for declarations in support of motions		
.2 Sort and save drafts of declaration for Sagi-Belcar		
.1 Research and add to memo re FLSA and California wages claims and subject matter jurisdiction		
.2 Add to draft amended motion for default judgment on FCA claims		
2.0 Evaluate length of brief, locate and review local rules and judges rules re		

Gregor Lesnik

Page 231

		<u>Rate</u>	<u>Amount</u>
	briefs .1 (partially charged)		
8/16/2020	locate, save, enhance Slovenian and Croatian translations of Third Amended Complaint; .2 Locate Fibula translation invoice, save .1 add to and prepare penultimate draft of motion for default - FCA 6.0 Add to draft declaration in support of first amended motions for default judgments 1.0 Review and revise draft motion for default California wages, save as to draft not to use for comparison to FLSA only amended motion for default judgment .3	400.00/hr	3,040.00
8/17/2020	Receive and review Lesnik v Eisenmann Corporation/The HarfordADJ9981538 (SJO) Objection to Communicaid, Inc. Petition for Costs	400.00/hr	40.00
	Download documents from One Legal, update spreadsheet .1 Translate Summons in Croatian and Slovenian .4	75.00/hr	37.50
	Assisted with formatting and cites for MPA and Decl 5.3	75.00/hr	397.50
	add to draft declaration in support of amended motions for default judgments 1.0 Add to and revise Papes motion for default judgment on individual wages claims .8 Review and revise FCA motion 1.2 Review Summons and translations .2 Add to MPA support default on coerced labor claims; save successive versions of todays drafts 2.5 Add to draft MPA on individual wages claims .5 E-mails with Pyle to attach drafts of motions and declarations in rough format and identifying status of issues and briefs .5 Call with Bojic .1 Multiple E-mails to and from Bojic, including attached drafts and revisions of declarations .2	400.00/hr	2,800.00

Gregor Lesnik

Page 232

		<u>Rate</u>	<u>Amount</u>
8/18/2020	Assisted with formatting and cites for MPA and Decl 1.75	75.00/hr	131.25
	receive from 2015 Lesnik workers comp proceeding objection to Communicaid Petition for Costs	400.00/hr	1,840.00
	.1 Analyze differences in Papes motion re wages with and without California wages claims		
	.4 Research Sullivan v Oracle on choice of law, review citations to jurisdiction		
	.5 Review cited cases for basis of pendent jurisdiction		
	.3 Locate, save, and review Ratha v Phatthana Seafood briefs; analyze Present In as term of art for jurisdiction		
	.7 Add to draft motion for default on coerced labor cause of action		
	2.0 E-mail to Pyle including research re collective class action and personal jurisdiction, excepts on wages claims, revisions including facts significant to the Sullivan v Oracle decision, and pleadings concerning service in Slovenian		
	.5 E-mail from Papes, forward to Bojic		
	.1		
8/19/2020	Assisted with formatting and cites for MPA and Decl 1.6	75.00/hr	120.00
	prepare insert to coerced labor of analysis of William Wilberforce Act language for extraterritorial jurisdiction	400.00/hr	3,520.00
	.5 Prepare insert re alter ego fact citations to record		
	2.5 Add to successive drafts of MPA on wages claims		
	5.5 Call with Bozinovic re translations and due date for declaration		
	.1 E-mails with Papes and Sagi-Belcar		
	.1 E-mail to Pyle re status of translations of proofs of service		
	.1		
8/20/2020	Assisted with formatting and cites for MPA and Decl 6	75.00/hr	450.00
	e-mail from Bojic enclosing notary declaration and Bojic declaration	.1	5,720.00
	Save exhibits of translations of proofs of service	3	
	Add to draft MPA default judgment on individual wages claims	.3	
	Add to draft MPA default judgment on coerced labor claims	3.5	
	Add to successive drafts of declaration in support of default judgments	1.0	
	Sort exhibits for motions by visas and welcome letters, review exhibit numbering; e-mail to Bernay re filing of documents designated as confidential		

Gregor Lesnik

Page 233

		<u>Rate</u>	<u>Amount</u>
	.5 E-mail to Foran to confirm prior withdrawn objection to confidentiality of Tesla access records .4 E-mail to Pyle explaining exhibits that were filed under seal .1 E-mail to court clerk on filing motions and obtaining hearing dates .1 E-mails to and from Bozinovic including sorting and attaching exhibits in native language and as translated; and main translations of proofs of service .3 E-mail to Bojic confirming receipt of statement .1 Save Belcar statement with exhibits .1 Sort, save, name and prepare to attach to Dresser Declaration copies of Tesla entry logs .2 Direct preparation of exhibit cover sheets .1 Identify, number for exhibits, and save as exhibits Orders, Summons, Complaint, waivers re service .4 Locate citations in record for factual allegations of activities in California, add to insert to MPAs 1.0 E-mail with Bojic re password protection of electronic copy of Croatian translation .1 Add to MPA re FCA 2.0 Consider compendium of authorities, consider RJN; locate copies of Orders, Motions, pleadings and ju		
8/20/2020	E-mail to Pyle explaining analysis .2 Call to Papes explaining analysis .3 Further e-mail to Holtzman re described documents and withdrawal of confidentiality designation, locate attachments of exhibits to file .2 E-mail from Holtzman directing plaintiff to file exhibits under seal except as heavily redacted .1	400.00/hr	320.00
8/21/2020	Printing and scanning of Dresser Dec exhibit 404, draft POS-verifying addresses 2.75 receive and save translations by Bozinovic of Certificates for service .3 E-mail to Bozinovic .1 Locate Order by Judge Kohn, E-mail from Holtzman, e-mail to Holtzman re filing under seal .3 E-mail to Papes, Lesnik and Travancic summarizing extent of jurisdiction under Article III for federal courts, and further activities in light of analysis 1.0 E-mails and calls with Hunter Pyle re limits on supplemental jurisdiction, rules of tolling individual and class claims, potential re-filing, and other bases of tolling; memo to file 1.5	75.00/hr 400.00/hr	206.25 2,800.00

Gregor Lesnik

Page 234

	<u>Rate</u>	<u>Amount</u>
E-mail from and to Foran re Tesla withdrawing designation of confidentiality .1		
E-mail from Clerk .1		
Print to pdf, sort, save and name e-mails and exhibits for proposed administrative motion to file under seal .4		
Multiple e-mails with Bozinovic re declaration .1		
Save all revised and completed Bozinovic translations and attachments .2		
Prepare revised Bozinovic declaration based on his statements .3		
E-mail to Bozinovic .1		
Save to pdf visas and welcome letters and save as proposed exhibits 1.0		
Translate German text found on visas and welcome letters, save memo .2		
Save binder of visas and letters, save further copy as enhanced .2		
E-mails to and from Holtzman objecting to challenge to confidential on basis of timing and specification of basis of challenge; review Order, prepare reply e-mail .5		
E-mail to Holtzman attaching binder of documents .1		
E-mail to Holtzman challenging confidentiality designation .2		
E-mail from Holtzman of Eisenmann proposed redactions .1		
Save as exhibit e-mail from Foran to identify why documents from Tesla are not filed under seal .1		
E-mail from Bojic .1		
8/22/2020 receive e-mails from counsel for Eisenmann .1	400.00/hr	3,760.00
Save e-mails for exhibits .2		
Review, revise and redact welcome letters and visas for exhibits, save exhibits 1.4		
Compare exhibits to unredacted letters and partially redacted visas, save corresponding sets for exhibits and for exhibits to file under seal .3		
Review local rules, review other applications in ND California, prepare administrative motion 1.5		
Prepare declaration in support of administrative motion 1.0		

Gregor Lesnik

Page 235

	<u>Rate</u>	<u>Amount</u>
Revise exhibits to declaration .1		
Prepare draft Supplemental Declaration in Support of motions 1.2		
Review attachments to draft Supplemental Declaration .2		
E-mail to counsel .2		
Revise memo re coerced labor judgments and orders .1		
Add to and complete Decl, Administrative Motion, proposed Order, and listing of exhibits to file under seal; save; convert to pdf 2.5		
Redact e-mails with Eisenmanns counsel .1		
Redact visas and letters per counsels demands .3		
Save all documents to pdf .1		
E-mail to counsel for Eisenmann .1		
8/23/2020 review exhibits, review declarations, and insert evidentiary references to all three draft amended motions for default judgments; save signature pages; save to file Bozinovic declaration 6.0	400.00/hr	6,440.00
Review and revise amended motions for Default Judgment on FCA, on Wages Claim, and coerced labor Claims including reasonable value of services analysis, damages calculation, jurisdictional basis for federal claims, and evidentiary references and draft updated tables 6.0		
E-mails with and call with Radmilo Bozinovic re revisions to proposed Declaration, revise declaration, e-mails to and from Bozinovic, save attached signed declaration .4		
E-mail to counsel re redactions, e-mails from counsel for Eisenmann to make changes in documents filed under seal, save e-mails, save attachments, compare to the proposed versions of the documents, e-mail to counsel re relevant information, memo re further redactions to welcome letters; make redactions; e-mail to counsel 2.0		
Locate Brotto addresses for Branko Tomas; save pdf of research, memo to file .3		
Prepare proposed Order on Coerced Labor claims .4		
Complete to file under seal Supplemental Dresser Declaration in support of motions for default judgments 1.0		

Gregor Lesnik

Page 236

	<u>Rate</u>	<u>Amount</u>
8/23/2020 US ex rel Lesnik, by Elma, enter as other paralegal Translations of documents for declarations and exhibits 2.0 (level 2)	75.00/hr	150.00
8/24/2020 Locate address info and research for Branko Tomas, assist with spread sheet for wages using papa decl efc 462, formatting of MPA, update POS 7	75.00/hr	525.00
e-mails from and to Bernay re redactions by Plaintiffs .1 discuss with staff and assist in completing spreadsheet of underpaid wages claims .4 E-mail from Bernay, review Eisenmann proposed exhibits .1 Revise administrative motion and declaration to reflect requested changes by Eisenmann to exhibits .3 E-mail to Bernay re adopted redactions and redactions not adopted .1 Call with Ruth Silver Taube re jurisdiction for coerced labor claims and under Title III limits .2 E-mail to Pyle re status of filings, opinion re jurisdiction for Title III courts, and intended Maslic complaint in state court for wages recoveries .1 Re-review research and analysis on pendent jurisdiction .2 Revise and complete administrative motion to file under seal "Welcome letters" and visas that identified the Vuzem management, including Motion, Declaration, redacted declaration to file, and unredacted declaration to file that does not have the exhibits attached 1.0 Revise and save signed and redacted welcome letters with redacted named as Exhibit nnn_A designation .2 E-file administrative motion .1 E-mails with Pyle re Title III courts' jurisdiction .2 revise and complete Motion for Default Judgment on FCA 4.0 E-mails with Pyle, locate and forward draft spreadsheet for wages and Exhibit A to prior motion for default judgment on wages claims .1 E-mail to Pyle draft motion for default judgment on wages claims, omitting claims for California wages, for Papes only .1 Call with Hunter Pyle re status, research re jurisdiction, and WCD filing of motions .3 revise and complete draft Motion for Default Judgment on Wages Claim 3.8 Compare wages spreadsheet with state claims and solely FLSA claims, save FLSA excel spreadsheet	400.00/hr	7,280.00
8/25/2020 Copy efiled documents .3 level 3	45.00/hr	13.50
Finished typed version of Release .3	75.00/hr	22.50

Gregor Lesnik

Page 237

	<u>Rate</u>	<u>Amount</u>
8/25/2020 formatting of MPA, POS 3.8	75.00/hr	285.00
revise and complete Motion for Default Judgment on Coerced Labor Claims 4.0	400.00/hr	3,560.00
Direct revisions to formatting and tables .1		
Locate and save attachments, and revise and complete Request for Judicial Notice of other Orders and Judgments .8		
Locate information on tolling, save for insert .1		
Locate information for service of motions, save for insert .1		
Prepare proposed Order on Motion for Default Judgment - FCA claims 1.0		
Prepare proposed Order re Coerced Labor claims .7		
Prepare proposed Order re Wages claims .6		
Review and revised Motion for Default Judgment on Coerced Labor Claims .2		
E-mails with Ruth Taube .1		
E-file motion, RJN and proposed Order .2		
File other proposed Orders .1		
Review spreadsheet; prepare Appendix cover pleading, attach spreadsheet, e-file .3		
Receive e-filing notices and e-filed copies of motions; save .1 (partially charged)		
Review FRCP, review cases interpreting dismissals, Prepare Request for Dismissals without prejudice of California wages claims, and of California TVPA claims; e-file dismissals .5		
8/26/2020 download efiled documents, added to Proof of Service, assist in serving Motions to 14 defendants 8.	75.00/hr	600.00
POS and preparing for international and domestic mailings and going to post office 6.2	75.00/hr	465.00
Receive and save e-filing notices and e-filed copies of motions and supporting declarations and documents .3	400.00/hr	360.00
Direct staff in printing and saving copies .1 (partially charged)		
e-mail to Clients regarding status and attaching filed motions		

Gregor Lesnik

Page 238

		<u>Rate</u>	<u>Amount</u>
	.1 E-mail from Taube, e-mail to Taube		
	.1 E-mail from Bernay, e-mail to Bernay attaching under seal docket 500-4		
	.1 Review and revise proofs of service		
	.2		
8/27/2020	Call to Court Clerk re Courtesy Copies to Judge, memo to file, assist in preparing documents, index tabs, exhibits for Judges Chambers	75.00/hr	525.00
	7.		
	Calculating postage, signing up w usps for tracking info preparing chamber's copy and delivering to Federal Court House drop box	75.00/hr	307.50
	4.1		
	review local rules re COVID, review Judge Kohs standing orders - current; save General Orders including GO 73	400.00/hr	400.00
	.1 (partially charged)		
	assist in organizing pleadings for delivery of Chambers Copies		
	.3 (partially charged)		
	review proposed Orders, revise as to interest on FLSA Wages Claims		
	.1		
	E-mail to Judge Koh attaching proposed Orders		
	.1		
	Save e-notice of filings, save e-notices, save e-filed pleadings and proposed Orders		
	.1 (partially charged)		
	Discuss with staff tracking of copies, mailing, and service, and of saving, printing and filing hard copies of motions		
	.1 (partially charged)		
	discuss, review and revise proofs of services		
	.2		
8/28/2020	Track and download tracking from USPS.com		37.50
	.5	75.00/hr	
	review tracking of service by priority mail with tracking of motions for default judgments	400.00/hr	80.00
	.1		
	Receive Eisenmann support of administrative motion to file under seal		
	.1		
8/30/2020	call with Gregor re status		80.00
	.2	400.00/hr	
8/31/2020	Organize file		30.00
	.4	75.00/hr	
	Track and download tracking from USPS.com		22.50
	.3	75.00/hr	

Gregor Lesnik

Page 239

		<u>Rate</u>	<u>Amount</u>
8/31/2020	review organization of and completeness of filed pleadings and orders .2 Review status of tracking priority mail .1	400.00/hr	120.00
9/1/2020	Track and download tracking from USPS.com .1	75.00/hr	7.50
	e-mails from and to Radmilo Bozinovic re assignment .1 Receive and save invoice .1 (no charge) receive notice of Order, save and calendar continued CMC date .1 Discuss with staff saving updates on status of mailing and delivery of motions .1	400.00/hr	120.00
9/2/2020	Translating Complaint 4.	75.00/hr	300.00
	Track and download tracking from USPS.com .1	75.00/hr	7.50
	save e-mails of past two weeks .2	400.00/hr	80.00
9/3/2020	Track and download tracking from USPS.com .3	75.00/hr	22.50
	save billing, save communication from Divjak .1 Save e-mails .1 E-mail from and to Bojic .1	400.00/hr	120.00
9/4/2020	e-mails with Bojic and with Bozinovic; arrange payment .2 (no charge)	400.00/hr	NO CHARGE
9/8/2020	Translating letters from client from the Slovenian court 1.0	75.00/hr	75.00
	Track and download tracking from USPS.com .25	75.00/hr	18.75
	texts from Gregor, review attachments, forward to office to save and translate .1 Texts with Stjepan .1 Call to Gregor .1 E-mail to Gregor, and to Stjepan and Danijel	400.00/hr	200.00

Gregor Lesnik

Page 240

		<u>Rate</u>	<u>Amount</u>
	.1 Discuss with staff status of and documentation concerning mailing of amended motions .1		
9/9/2020	download document from client, translate documents .5	75.00/hr	37.50
	Track and download tracking from USPS.com .25	75.00/hr	18.75
	e-mails from Papes and from Lesnik .1 Receive e-mail from attorney Bernay re confidentiality designation .1 Prepare reply e-mail to Bernay .4 Discuss with staff documentation of mailing and delivery of amended motions .1 Review Vuzem request to prosecute Gregor .1	400.00/hr	320.00
9/10/2020	Translating documents 3.	75.00/hr	225.00
9/11/2020	review declaration of West in support of Eisenmann support for admin motion to file under seal .2 Research regarding confidentiality including designation of discovery docs and information 1.0 Prepare draft letter to counsel re wholesale designation of documents .7	400.00/hr	760.00
9/13/2020	e-mail from and to Martina Vandenberg .1	400.00/hr	40.00
9/14/2020	translating documents 2	75.00/hr	150.00
9/16/2020	Track and download tracking from USPS.com .2 No charge	75.00/hr	NO CHARGE
9/17/2020	Receive and review Returned US Ex Rel Lesnik amended motions from HRID-d.o.o. Translate documents 2.	400.00/hr 75.00/hr	NO CHARGE 150.00

Gregor Lesnik

Page 241

		<u>Rate</u>	<u>Amount</u>
9/17/2020	Track and download tracking from USPS.com-research correct address for HRID-Mont d.o.o. 1.75	75.00/hr	131.25
	call with Martina Vandenberg .5	400.00/hr	200.00
	direct saving records of mailing and service of motions .1	400.00/hr	40.00
9/18/2020	Remail amended motions for HRID-Mont d.o.o. .25	75.00/hr	18.75
	e-mail from and to Odvetnik Divjak .1	400.00/hr	40.00
9/20/2020	calls with Gregor .5	400.00/hr	200.00
9/21/2020	Receive and review Returned Motions Default Judgement sent 3/2/2020. D2N Technoloj Tracking Amended Motions via USPS .1	400.00/hr 75.00/hr	40.00 7.50
	save e-mails with Gregor, Odvetnik Divjak, Stjepan and Danijel .2	400.00/hr	160.00
	save e-mail to Martina Vandenberg .1		
	Discussion with staff re status, and re preparing declaration, re status of mailing and service of motions to overseas defendants .1		
	e-mails to and from Odvetnik Luka Divjak, review allegation by Vuzem, review settlement agreement and release, make searchable, e-mail to Divjak .1 (partially charged)	400.00/hr	40.00
9/22/2020	Tracking Amended Motions via USPS .1	75.00/hr	7.50
	receive e-notice of motion, and Motion by D2N to set aside default; print; review; calendar due dates .3	400.00/hr	120.00
	discuss with staff scanning and noting attempted service and mailing addresses, re-direct service to addresses known to be good from prior successful mailing or personal service .1	400.00/hr	40.00
9/23/2020	Tracking Amended Motions via USPS .1	75.00/hr	7.50

Gregor Lesnik

Page 242

		<u>Rate</u>	<u>Amount</u>
9/24/2020	Locate all pleadings from February to August and prepared proof of service for new attorney for D2N 5.	75.00/hr	375.00
	Receive and review CA Sectary of State- returned amended motions	400.00/hr	40.00
	Tracking Amended Motions via USPS .3	75.00/hr	22.50
	receive deft D2N proposed Order, update proof of service, research re defendant atty .4	400.00/hr	960.00
	Complete for service and notification letter to attorneys for Eisenmann regarding challenge to confidentiality desiagnation 2.0		
9/25/2020	Tracking Amended Motions via USPS and email all pleadings to D2N 2.1	75.00/hr	120.00
	review docket for accuracy and completeness of pleadings, direct revisions to supplemental proof of service of pleadings .2	400.00/hr	200.00
	Review e-mails sent by staff to counsel for D2N attaching pleadings .1		
	Discuss status of service on Slovenian entities .1		
	Review updated proof of service .1		
9/28/2020	Receive and review Returned of Summons, 3rd Amended Complaint from MDM Polska sp z.o.o	400.00/hr	40.00
	Tracking Amended Motions via USPS .1	75.00/hr	7.50
	direct saving pdf file for each delivery abroad .1	400.00/hr	40.00
9/29/2020	Receive and review Returned Amended Motions from ISM Vuzem USA, Inc. Las Vegas	400.00/hr	40.00
	calls with Stjepan Papes .2	400.00/hr	80.00
9/30/2020	Receive and review Notice of Appearance as Counsel- Paul Strickland for D2N	400.00/hr	40.00
	calls with Stjepan Papes .2	400.00/hr	360.00
	Receive notice of appearance by counsel Strickland for D2N .1		

Gregor Lesnik

Page 243

	<u>Rate</u>	<u>Amount</u>
Evaluate proof required to oppose motion .2		
E-mail to attorney Divjak .2		
E-mail to Sagi-Belcar .1		
E-mail to Stjepan .1		
10/1/2020 Tracking Amended Motions via USPS .1	75.00/hr	7.50
Download pleadings from pacer, save to server .1	75.00/hr	7.50
Translate documents 3.	75.00/hr	225.00
attempted calls to Divjak .1	400.00/hr	1,040.00
Sort out prior filed pleadings, declarations and exhibits re D2N, save for exhibits .5		
Direct machine translation of service documents from Fokus, d.o.o. .2		
Direct staff to save internet confirmations of mailing and receipt of motions .1		
Prepare draft declaration for Radmilo Bozinovic .8		
Prepare proposed supplemental declaration of Divjak .7		
Revise draft declaration of Divjak .1		
E-mail to Divjak .1		
10/2/2020 e-mail from Divjak, save attachment .1	400.00/hr	120.00
Prepare to file Divjak Decl in opposition to D2N motion .1		
Save e-mails .1		
e-mail from Papes of docs re service on D2N .1	400.00/hr	40.00
10/4/2020 review calendar, e-mail to counsel for Eisenmann .1	400.00/hr	1,640.00
Review briefs and research re subject matter jurisdiction, view facebook or oral arguments in coerced labor claim, save memos .7		
Add to facts, add to cited authorities, and add argument re personal		

Gregor Lesnik

Page 244

		<u>Rate</u>	<u>Amount</u>
	jurisdiction and re subject matter jurisdiction with citations to record in opposition to motion by D2N Tehnologije, d.o.o. 2.5 Review Ratha v Phattana Seafood oral argument notes; E-mails with counsel on appeal in Ratha v Phattana Seafood .1 E-mail from Papes re collections .1 Research re collections .5 E-mails with counsel for Eisenmann re meet and confer .1		
10/5/2020	Locate and translate documents 1.5 Organize files 4.	75.00/hr	142.50
	Locate and translate documents 1.5 Organize files 4.	75.00/hr	142.50
	save docs and e-mails for meet and confer with attorneys Bernay and Holtzman .1 Further e-mails to schedule call, calendar same .1 Locate service information from D2N motion, revise proof of service .1 Prepare memo indexing Eisenmann production, prepare memo of documents not produced .2 Call with counsel for Eisenmann 1.0 prepare memo to file .2 Prepare confirming e-mail .1 E-mail from Bozinovic .1 (no charge)	400.00/hr	1,120.00
10/6/2020	Tracking Amended Motions via USPS Location documents for exhibits to WCD Decl, prepare to e file WCD dec, Divjek dec and POS, MPA- TOC and TofA 7	75.00/hr	525.00
	assisted with d2n Motions 7	75.00/hr	525.00

Gregor Lesnik

Page 245

		<u>Rate</u>	<u>Amount</u>
10/6/2020	locate, sort, name and organize exhibits to Decl in opposition to D2N motion to vacate default 3.0 Direct staff to make revisions to declaration and to shell MPA .1 Investigate Tanja Dukaric, and for Bojan Dukaric, save social media posts .2 E-mails to counsel for Eisenmann regarding filing in public file Eisenmann D2N purchase order .1 save to file Divjak Decl .1 Prepare inserts of facts for Decl and for statement of facts in oppo to D2N motion 1.0 Add to draft declaration .8 E-mail from Gregor .1 Multiple e-mails to and from translator Bozinovic and call with Bozinovic .3 (partially charged) Revise proposed declaration for Bozinovic .2 Receive e-mail and save signature .1 Revise and complete penultimate draft of MPA 1.5 Revise and complete penultimate draft of Declaration .5 Discuss with staff organization of exhibits for attachment to declaration .1 Proof, complete and e-file MPA, Decl of Dresser, Declaration of Divjak, and proof of service in opposition to D2N motion to set aside clerks entry of default .6 Prepare initial draft of administrative motion, proof of service, and proposed Order for potential motion to file under seal 1.0	400.00/hr	3,880.00
10/7/2020	save e-mails, drafts and attachments for draft oppo to D2N motion .1 (partially charged) receive e-notices and filed copy of opposition to motion, download, save, print, organize copy for office, and copy for Court .2 (partially charged) discuss preparing supplemental proof of service .1 E-mail to clients re D2N motion .1 Prepare supplemental declaration for corrected Bozinovic declaration .2 E-mails with Bozinovic .1	400.00/hr	640.00

Gregor Lesnik

Page 246

		<u>Rate</u>	<u>Amount</u>
	Complete to file and serve MPA in opposition to D2N motion, declaration of WCD, declaration of Divjak; receive e-filing confirmation; download, save and print filed motion .4		
	E-mail to Gregor, Stjepan and Danijel re D2N motion and opposition .1		
	Prepare supplemental declaration to attach corrected declaration of Bozinovic; prepare to file and e-file with proof of service .3 (partially charged)		
10/7/2020	e-mail from Gregor, translate e-mail re disability claim, review Slovenian Disability initial reviewer decision, locate medical records, e-mail to Gregor .5	400.00/hr	200.00
10/8/2020	Receive and review Returned amended motions from ISM Vuzem USA Inc c/o Branko Tomas PO Box	400.00/hr	40.00
	Tracking Amended Motions via USPS .1	75.00/hr	7.50
	Organize Pleadings, Discovery, Correspondence, Client docs, Atty Notes, Atty Research 5.	75.00/hr	375.00
	review status of mailing service of amended motion for default judgments; direct scan of returned envelopes, and saving mailing information from USPS website .1	400.00/hr	120.00
	Research re jurisdiction, memo to file of law and citations .1		
	Scan and save letter from LB Metal, d.o.o. .1		
10/9/2020	Tracking Amended Motions via USPS .1	75.00/hr	7.50
	e-mails from Gregor, e-mail to Gregor attaching medical records including referring to key words and phrases for head injury and distress .3	400.00/hr	120.00
	e-mail from Bozinovic .1	400.00/hr	40.00
10/12/2020	e-mail from Gregor re loan for disability evaluation .1	400.00/hr	40.00
10/13/2020	Receive and review Returned amended motions that were sent on 8/28/2020. Returned from ISM Vuzem- unclaimed from Slovenian Post Office Tracking: CJ452838379US	400.00/hr	40.00

Gregor Lesnik

Page 247

		<u>Rate</u>	<u>Amount</u>
10/13/2020	receive e-notice of and Reply by D2N in support of its motion to set aside default; download, save, print and review same .2	400.00/hr	80.00
10/14/2020	Receive and review Magna d.o.o. returned amended motions mailed 8/25/2020 CH452837342US (unclaimed) Robert Vuzem returned amended motions mailed 8/25/2020 CH452838334US (unclaimed)	400.00/hr	40.00
	Tracking Amended Motions via USPS 1	75.00/hr	75.00
	e-mail to attorney Divjak re service documents and D2N motion; machine translate into Slovenian .2	400.00/hr	80.00
10/16/2020	Receive and review Declaration of Mark West ISO Deft Eisenmann Corp Notice to Motion and Motion to Retain Confidentiality Designations EFC 524-2 Declaration of Aaron M Bernay ISO Deft Eisenmann Corp Notice to Motion and Motion to Retain Confidentiality Designations EFC 524-1 Proposed Order Granting Deft Eisenmann Corp Notice to Motion and Motion to Retain Confidentiality Designations EFC 524-3 Deft Eisenmann Corp Notice to Motion and Motion to Retain Confidentiality Designations EFC 524 receive yesterday's late filed motion by Eisenmann to retain confidentiality, Declaration of Bernay and of West and proposed Order; calendar .1	400.00/hr	40.00
10/18/2020	call with Papes .3	400.00/hr	120.00
10/19/2020	review stipulated protective order, analyze language of challenging confidential designation .1 Review Eisenmann Answer to complaint; analyze same; prepare insert to MPA .2 Research re citizenship authorities, memo to file .2 Research re personal jurisdiction, memo to file .2 Research re protective order, memo to file .1	400.00/hr	320.00
10/23/2020	research re protective orders .1	400.00/hr	40.00

Gregor Lesnik

Page 248

		<u>Rate</u>	<u>Amount</u>
10/28/2020	Draft shells of MPA, Dec, Admin Mtn to file under seal, Proposed order, POS in response to Eisenmann 1.5	75.00/hr	112.50
	locate and save e-mails to support motion to compel compliance with settlement by production .2 Identify issues for confidentiality, review Orders .2 Prepare draft administrative motion, prepare draft MPA in opposition to motion to designate as confidential; complete penultimate draft unredacted declaration re designation of all documents as confidential 1.2	400.00/hr	640.00
10/29/2020	Update WCD Dec w exhibit info, POSs & assist w/ MPA 2.7	75.00/hr	202.50
	evaluate drafts .2 Research lack of confidentiality for documents concerning criminal or prohibited conduct, memo to file .3 complete Memorandum and Declaration in opposition to Eisenmann motion to retain confidentiality designation 6.5 Direct cover pages for exhibits for filing .1 Prepare administrative motion to file under seal 1.0 Create redacted and unredacted copies of MPA and of Declaration .7 Prepare proposed order on administrative motion to file under seal .3 Prepare proof of service .1 E-mail to counsel .1	400.00/hr	3,320.00
10/30/2020	receive e-notices of filing, download, save and print pleadings; print copy for court and direct delivery of chambers copies .1 (partially charged)	400.00/hr	40.00
11/3/2020	prepare requests to enter default against Mos Servis, d.o.o., We-Kr, d.o.o., Vuzem USA, Inc., ISM Vuzem USA, Inc., locate attachments for declarations 3.0	400.00/hr	1,200.00
	receive and save yesterday's filing by Eisenmann of declaration and proposed Order to file under seal .1	400.00/hr	40.00

Gregor Lesnik

Page 249

		<u>Rate</u>	<u>Amount</u>
11/6/2020	Receive and review Defendant Eisenmann Corporation's Reply in Support of Motion to Retain Confidentiality Designations- EFC 529	400.00/hr	40.00
	review Eisenman reply in support of motion to retain confidentiality .2	400.00/hr	80.00
11/9/2020	e-mail from Gregor .1	400.00/hr	40.00
11/12/2020	Draft MPA ISO enforcement of settlement, dec WCD, supp dec WCD, POS .6	75.00/hr	45.00
	Worked on MPA 1.	75.00/hr	75.00
	prepare draft motion to compel enforcement of settlement 1.0	400.00/hr	480.00
	Prepare declaration .2		
11/16/2020	Receive and review Returned from HRID-Mont- unclaimed	400.00/hr	40.00
	Spreadsheet for mailing log 1.5	75.00/hr	112.50
	Worked on shells for documents supporting Motion to Compel 2.	75.00/hr	150.00
	receive e-notice re zoom appearance; add note to calendar .1	400.00/hr	40.00
11/17/2020	Spreadsheet for mailing log, Memo & decl of shipment history on Amended Default Motions 2.7	75.00/hr	202.50
	direct update of service spreadsheet .1	400.00/hr	560.00
	Review Material Term Sheet .1		
	Prepare draft declaration in support of motion to compel enforcement of settlement .8		
	Locate and save docs and draft letter for exhibits to decl .2		
	Discuss with staff preparing proofs of service for all US and foreign mailing .2		
11/18/2020	decl of shipment history on Amended Default Motions 1.9	75.00/hr	142.50

Gregor Lesnik

Page 250

	<u>Rate</u>	<u>Amount</u>
11/18/2020 Prepared Exhibit List 1.0	75.00/hr	75.00
continue to add to MPA in support of motion to compel enforcement of settlement .6	400.00/hr	320.00
Direct and Review staff completed lettered exhibits from source folders of documents .2		
11/19/2020 TOC & TOA for MPA ISO MTC Enforcement of Settlement & drafts for underseal filing, exhibit coversheets 2.4	75.00/hr	180.00
Add Exhibit list to WCD Declaration, review and add to Table of Authorities for Motion to compel 1.2	75.00/hr	90.00
save revised draft declaration with updated exhibits list .1	400.00/hr	1,120.00
Research re confidentiality in cases involving settlement agreements .1		
Direct exhibit organizing and cover pages for exhibits .1		
Identify and save exhibits and subexhibits .1		
Add to penultimate draft of decl in support of motion to compel enforcement of settlement 1.0		
Prepare penultimate draft of MPA 1.0		
Prepare initial draft of administrative motion to file under seal re mtn to compel enforcement of settlement .4		
11/20/2020 TOC & TOA for MPA ISO MTC Enforcement of Settlement & drafts for underseal filing, exhibit coversheets, combine exhibits in Dec and finalize tables in MPA .5	75.00/hr	37.50
go to and save Docket .1	400.00/hr	1,240.00
Call with Strickland, counsel for D2N .5		
Add to and complete declaration in support of motion to compel enforcement of settlement 2.0		
Add to MPA in support of motion .5		

Gregor Lesnik

Page 251

	<u>Rate</u>	<u>Amount</u>
11/22/2020 check EFC/Pacer for US Ex Rel Lesnik info on hearing .1	400.00/hr	40.00
11/23/2020 editing mpa 1.0	75.00/hr	75.00
TOC & TOA for MPA ISO MTC Enforcement of Settlement & drafts for underseal filing, exhibit coversheets, combine exhibits in Dec and finalize tables in MPA 2.9	75.00/hr	217.50
organize file in preparation for hearing on Eisenmann Motion to Retain Confidential Designation .6 Calendar .1 Complete motion to enforce settlement 2.0 Review corrected tables, complete for filing motion .2 Review and revise, and prepare for filing declaration .8 E-mails with court clerk to obtain hearing date .1 Calendar hearing, revise notice dates .2 Review redactions to exhibits .4 Revise declaration; review MPA; revise and complete administrative motion to file under seal; complete proofs of service; complete sorting redacted and unredacted exhibits; complete review and finalizing redactions to brief; organize all pleadings for filing 3.0 Complete to file declaration with redacted exhibits	400.00/hr	2,960.00
11/24/2020 Prepare plds for efiling .2	75.00/hr	15.00
Receive and review Order Granting in part Defendant Eisenmann Corporation's Notice of Motion and Motion to Retain Confidentiality Designations	400.00/hr	40.00
prepare notes in preparation for hearing 1.0 Prepare for and attend hearing on Eisenmann Motion to Retain Confidential Designation; via Zoom 1.0 Receive minute order .1 Review ready to E-file mtn to compel enforcement of settlement .1 Review Order consistent with courts questions during hearing re	400.00/hr	1,440.00

Gregor Lesnik

Page 252

		<u>Rate</u>	<u>Amount</u>
	confidentiality of documents		
	.1		
	Revise administrative mtn to file under seal to be consistent with language of Judge Van Keulens Order		
	.2		
	Revise proposed Order to file under seal		
	.1		
	Review, execute and prepare to file motion and administrative motion		
	.1		
	Complete redacted declaration, redacted exhibits, and redacted motion		
	.7		
	E-mail to Bernay and Holtzman		
	.1		
	E-mails with Bernay re providing copies to Foran		
	.1		
11/25/2020	Prepare declaration for Judges copy, exhibits, redaction, etc., personally delivered to chambers	75.00/hr	281.25
	3.75		
	Assisting with chambers copy for Judge Koh		138.75
	1.85	75.00/hr	
	save e-mails		160.00
	.1	400.00/hr	
	receive e-filed pleadings, save, print, calendar		
	.1		
	E-mail to Foran		
	.1		
	Search and confirm filed under seal pleadings including declaration with exhibits		
	.1		
12/1/2020	review Eisenmann declaration to support confidentiality		120.00
	.1	400.00/hr	
	Review confidentiality agreement		
	.1		
	E-mail to Foran		
	.1		
12/3/2020	e-mails with Galin		480.00
	.1 (no charge)	400.00/hr	
	e-mail from Papes; save documents from hyperlink; review same in Slovenian and Croatian, and in English		
	1.2		
12/4/2020	review calendaring		80.00
	.1	400.00/hr	
	E-mail to Stjepan and Gregor		
	.1		

Gregor Lesnik

Page 253

	<u>Rate</u>	<u>Amount</u>
12/7/2020 e-mail to Gregor re disability .1	400.00/hr	40.00
12/8/2020 review declaration re service of amended motions .2	400.00/hr	80.00
12/9/2020 Receive and review Eisenmann Corporation's Administrative Motion for Leave to File Under Seal Opposition to Motion to Compel Enforcement of Settlement and Supporting Declarations EFC 536; Declaration of Aaron M. Bernay In Support of Eisenmann Corporation's Administrative Motion for Leave to File Under Seal Opposition to Motion to Compel Enforcement of Settlement and Supporting Declarations EFC 536-1; [Proposed] Order Granting Eisenmann Corporation's Administrative Motion to File Under Seal Opposition to Motion to Compel Enforcement of Settlement and Supporting Declarations EFC 536-2; Eisenmann Corporation's Opposition to Plaintiffs Gregor Lesnik and Stjepan Papes's Motion to Compel Enforcement of Settlement EFC 563-3; Eisenmann Corporation's Opposition to Plaintiffs Gregor Lesnik and Stjepan Papes's Motion to Compel Enforcement of Settlement EFC 536-4; Declaration of Aaron M. Bernay In Support of Eisenmann Corporation's Opposition to Plaintiffs' Motion to Compel Enforcement of Settlement EFC 536-5 Declaration of Aaron M. Bernay In Support of Eisenmann Corporation's Opposition to Plaintiffs' Motion to Compel Enforcement of Settlement EFC 536-6; Declaration of Cassiano Fabris In Support of Eisenmann Corporation's Opposition to Plaintiffs' Motion to Compel Enforcement of Settlement EFC 536-7 Declaration of Cassiano Fabris In Support of Eisenmann Corporation's Opposition to Plaintiffs' Motion to Compel Enforcement of Settlement EFC 536-8 Certificate of Service EFC 536-9; Eisenmann Corporation's Opposition to Plaintiffs Gregor Lesnik And Stjepan Papes's Motion to Compel Enforcement of Settlement EFC 537 Declaration of Aaron M. Bernay In Support of Eisenmann Corporation's Opposition to Plaintiffs' Motion to Compel Enforcement of Settlement EFC 537-1 Declaration of Cassiano Fabris In Support of Eisenmann Corporation's Opposition to Plaintiffs' Motion to Compel Enforcement of Settlement EFC 537-2 Receive and review Eisenmann motions to file under seal, opposition to motion to enforce settlement with declarations; e-mail from counsel attaching unredacted copies of declarations and opposition; review same .4	400.00/hr	160.00
12/11/2020 evaluate whether to respond to or oppose Eisenmann motion to file under seal .1	400.00/hr	40.00

Gregor Lesnik

Page 254

		<u>Rate</u>	<u>Amount</u>
12/11/2020	review declaration re service of amended motions for default judgments, revise language, direct completion of declaration and of organized exhibits to declaration .3	400.00/hr	120.00
12/14/2020	begin to prepare outline for reply in support of motion to compel enforcement of settlement; begin to prepare reply brief 2.4	400.00/hr	960.00
12/15/2020	evaluate objections to evidence; research and locate rulings and orders on evidentiary objections; conduct investigation into Cassiano Fabris, locate LinkedIn, save posting, save posting as exhibit 1.0 evaluate additions to reply MPA, insert facts and cited evidence into MPA 2.2 research FRE for evidentiary objections, review civil local rules, review various district court orders from research, memo to file 1.0 Insert evidentiary objections into Reply MPA .4 research care, custody and control, memo to file; add to reply MPA 1.2 Direct staff to update tables .1 Review draft reply, re-arrange text thematically, correct grammar and citations, complete penultimate draft reply MPA 1.0 Review and correct reply MPA, add to text, complete .5 Prepare reply declaration .4 Complete to file reply declaration; compile exhibit in pdf for reply .2 Complete to file reply MPA .2 Evaluate filing under seal .1 Prepare redacted reply MPA .3 E-file reply Decl and redacted reply MPA .1 Prepare administrative motion to file under seal; revise, correct, complete 1.0 Prepare proposed Order .2 Prepare proof of service, revise to add reply MPA and reply Decl .2 Complete to file admin motion, order and proof of service .1 E-file administrative motion .1	400.00/hr	4,160.00

Gregor Lesnik

Page 255

		<u>Rate</u>	<u>Amount</u>
	E-mail to counsel unredacted reply MPA .1		
12/15/2020	mark citations, and rules of evidence, update table of authorities and cases .5	75.00/hr	37.50
12/16/2020	receive and save e-notices of filing, filed reply MPA and Decl and admin motion, print for file copy, print for copy for court .3 Review and complete for filing Supplemental Decl of DelGiudice re service of amended motions for default judgments .2 E-file proof of service, receive e-notice of filing, print for file copy and print copy for court .2	400.00/hr	280.00
	Organized all the pleadings relating to Motion to Compel Enforcement of Settlement and prepared copy of Judges chambers for Judge Koh, personally deliver to Judge Koh 1.5	75.00/hr	112.50
12/21/2020	Receive and review email with D2N attachments	400.00/hr	40.00
12/28/2020	Search for D2N Proof of Service, organize file .5	400.00/hr	200.00
12/30/2020	receive clerks notice vacating January 7 hearing; revise calendar .1 E-mail to Gregor, Stjepan and Danijel .1	400.00/hr	80.00
1/13/2021	call with Ron Slates re collections issues .1	400.00/hr	40.00
	Check for status of CourtCall, memo to file .1	75.00/hr	7.50
1/16/2021	research re discovery .1	400.00/hr	40.00
1/19/2021	e-mails with Luka Divjac .1 E-mail from and to Stjepan Papes .1	400.00/hr	80.00
1/21/2021	receive Order .1 Review case filings, prepare memo for inserts; Prepare draft Joint Case Management Statement; e-mail to counsel 1.0 E-mails with counsel for Eisenmann	400.00/hr	760.00

Gregor Lesnik

Page 256

	<u>Rate</u>	<u>Amount</u>
.1 E-mails from counsel for Eisenmann and from D2N, revise proposed Joint CM Statement, e-mail to counsel		
.3 E-mail from counsel for D2N, save revision, e-mail to counsel for Tesla and Eisenmann		
.1		
1/22/2021 e-mails from Foran and Bernay		240.00
.1 Revise calendar re zoom call with Luka Divjac	400.00/hr	
.1 Complete to file Joint Case Management Statement		
.2 E-file same; receive confirmation of filing, save e-notification and filed CM Statement		
.1 e-mails with Luka Divjac re zoom call; calendar same		
.1		
Receive and review Joint Case Management Conference Statement	400.00/hr	40.00
1/24/2021 zoom call with Luka Divjac re collections		360.00
.9	400.00/hr	
1/27/2021 e-mail from attorney Strickland for D2N that litigation is expensive and delayed		200.00
.1	400.00/hr	
E-mail to Strickland		
.1		
Call with Papes		
.3		
1/31/2021 e-mail to attorney Divjak		120.00
.1	400.00/hr	
E-mail to clients		
.1		
E-mail from and to Stjepan		
.1		
2/1/2021 e-mails with Odvetnik Luka Divjak re collections services		160.00
.1	400.00/hr	
E-mail to clients		
.1		
Save e-mails with clients and counsel		
.1		
Call with Stjepan		
.1		

Gregor Lesnik

Page 257

		<u>Rate</u>	<u>Amount</u>
2/1/2021	save e-mails with clients .1	400.00/hr	40.00
2/3/2021	e-mail to attorney for D2N re settlement .1 receive e-mail from counsel, save and review attached proposed Joint Case Management Statement, add text; e-mail to counsel .3	400.00/hr	160.00
	e-mail from Lesnik; e-mail from Papes; call with Papes, e-mails with Papes; e-mail to and from Danijel about Slovenia court order to deny prosecution of Gregor .3	400.00/hr	120.00
2/4/2021	e-mail from counsel for D2N; review and complete to file Joint Case Management Statement, e-file same .3	400.00/hr	120.00
	Receive and review Joint case management conference statement	400.00/hr	40.00
2/5/2021	e-mail to clients re status .2	400.00/hr	80.00
	Receive and review Order on administrative motion for leave to file under seal	400.00/hr	40.00
2/7/2021	e-mail to counsel re 1099 .1	400.00/hr	40.00
2/8/2021	receive e-notice of and Order on administrative motion to file under seal - confidentiality; save, print, review .1 E-mail to Holtzman and Bernay .1	400.00/hr	80.00
	Receive and review Order on administrative motion for leave to file under seal	400.00/hr	40.00
2/9/2021	e-mails with Luka Divjac .1 E-mail from attorney Holtzman .1 Review wire information, e-mail to Divjak .1 Receive e-notification of vacating hearing dates and rescheduling, save and print Minute Order, update calendar .1	400.00/hr	160.00
	Receive and review notice of electronic filing of clerk's notice vacating pretrial conference and continuing case management conference	400.00/hr	40.00

Gregor Lesnik

Page 258

		<u>Rate</u>	<u>Amount</u>
2/10/2021	receive e-notice of Order and Order granting D2N motion to vacate default; review same .1	400.00/hr	40.00
	Receive and review Order granting defendant's motion to set aside clerk's entry6 of default	400.00/hr	40.00
2/11/2021	receive further e-notices re Order on motions for default judgment; save .1 E-mails from and to Papes .1 E-mails to clients .1 E-mail to Divjak .1	400.00/hr	160.00
2/12/2021	E-mail from and to Divjak .1	400.00/hr	40.00
	Receive and review Order granting administrative motion to seal	400.00/hr	40.00
2/13/2021	receive e-notification of, download, save and review Order on Administrative Motion to File Under Seal .1 Prepare e-mail to defense counsel preparatory to filing further amended motion .1	400.00/hr	80.00
2/19/2021	e-mails from and to Luka Divjak; update calendar .1	400.00/hr	40.00
2/21/2021	zoom call with Luka Divjac .3	400.00/hr	120.00
2/23/2021	review Order, locate English and Slovenian versions of statutes; prepare draft of e-mail to Divjak re translation of Slovenian statutes regarding service .2 Review Order, memo re further actions required by Order .2	400.00/hr	160.00
2/24/2021	determine what issues need assistance from Divjak; begin draft e-mails to Divjak with attachments .3 E-mail to Divjak re translation of Slovenian statutes regarding service .1 Review e-mail from Divjak re service on D2N: E-mail to Divjak re completing service on D2N .2 E-mail to Divjak re service on Magna, doo .1	400.00/hr	360.00

		Rate	Amount
	Prepare outline for MPA .2		
2/25/2021	review e-mail from Luka Divjak, begin draft declaration .3	400.00/hr	120.00
3/6/2021	add information for outline of things to complete renewed motions .3	400.00/hr	120.00
3/16/2021	e-mails from counsel, save attachment .1 Revised proposed Joint CMC Statement .8 Calls to and e-mail to counsel for D2N .1	400.00/hr	400.00
3/17/2021	review multiple versions of revised proposed Joint CMC Statement, research local rules, further e-mails with counsel; prepare alternative proposed Joint CMC Statements; review defendant Eisenmanns further proposed Joint CMC; Complete and file Joint CMC Statement 1.0	400.00/hr	400.00
3/18/2021	Review Order on prior motions for default judgments, review notes, review e-mails from Divjak, review draft of and complete proposed Declaration of Luka Divjak 1.0 Locate internet information for translator Ana Rostohar, prepare draft declaration .6 Locate prior draft of machine translation of statute, correct and make changes to a Word version for text, content, and format .5 (partially charged) E-mail to attorney Divjak .1 E-mail to Bojic .1	400.00/hr	920.00
	Receive and review Order Setting Deadline for Service of Process on Defendant D2N Tehnologije d.o.o.	400.00/hr	40.00
3/19/2021	receive and review Order re service on D2N; print; calendar .1 Receive and review Order continuing CMC; print; calendar .1	400.00/hr	80.00
	Receive and review Clerk's Notice of Continuing Case Management Conference	400.00/hr	40.00
3/22/2021	e-mail from and to Bojic re translation .1 E-mail to Divjak re service on D2N	400.00/hr	200.00

Gregor Lesnik

Page 260

		<u>Rate</u>	<u>Amount</u>
	.1 Save Divjak e-mail and Decl, combine with exhibits, save to file, e-mail to Divjak		
	.2 Receive e-notice of Order; Save Order vacating hearing; update calendar		
	.1		
3/22/2021	locate and save all translated documents		75.00
	1.	75.00/hr	
3/23/2021	review prior filed declarations for exhibit cover pages and completeness		440.00
	.3 Review prior filed motions for default judgments, evaluate changes and additions	400.00/hr	
	.5 E-mail to clients re status of motions and of service		
	.2 E-mails from and to Bojic re translations by Ana Rostohar		
	.1		
3/24/2021	e-mail from and to Odvetnik Divjak re attempted service on D2N and permissible means of service under Hague Convention		920.00
	.1 review searchable documents produced by Tesla, sort and save documents showing each defendant involvement	400.00/hr	
	1.0 Locate all information re Magna, search internet for current information, search produced documents for any reference to known Magna employees and officer		
	.5 Prepare e-mail to clients		
	.3 Prepare memo of to do actions for renewed motions		
	.2 E-mails from and to Stjepan re known facts		
	.2		
3/25/2021	call with Papes		1,480.00
	1.5 Revise proposed declaration of Papes	400.00/hr	
	2.0 E-mail to Papes		
	.2		
3/26/2021	call from Papes		320.00
	.1 Receive and Review e-mail from Papes, revise draft declaration, save	400.00/hr	
	.5 E-mail to Papes		
	.1		

Gregor Lesnik

Page 261

	<u>Rate</u>	<u>Amount</u>
E-mail to Danijel .1		
3/26/2021 Receive and review Declaration of Ana Rostohar	400.00/hr	40.00
3/27/2021 Receive and review e from Papes re declaration	400.00/hr	40.00
3/28/2021 review and revise draft Renewed Motion for Default Judgment on Coerced Labor Claim, including research Schwarzenegger opinion, cases cited in opinion, and cases referring to opinion 2.0	400.00/hr	800.00
3/29/2021 locate exhibits from prior declarations of Papes, Lesnik and Dresser, save to draft folder for renewed motions .3 Compare new exhibits for WCD declaration with documents previously used as exhibits .2 Locate documents filed under seal, compare to February 8, 2021, and November 24, 2020 Orders re filing under seal, review documents produced by Eisenmann filed under seal, locate e-mails with counsel for Eisenmann; prepare e-mail to Bernay and Holtzman .7 locate Foran e-mail re filing under seal; label intended further Tesla entrance records documents; e-mail to Foran .2 Receive e-mail from Papes, review attachment .1 Call to Stjepan .1 Convert declaration to pdf, extract signature page, save; e-mail to Stjepan .1 E-mail from Stjepan .1 Evaluate all filed declarations and requests for judicial notice for procedure, comparison to courts Order, review local rules re slip sheets - required, and bookmarks - not required, and need for filing same or similar declarations to comply with procedural and substantive requirements of courts Order 4.5 E-mails from and to Bernay and Holtzman re: documents to file under seal .2 Receive Papes signature page by late night e-mail .1	400.00/hr	2,640.00
3/30/2021 evaluate changes for Lesnik declaration, exhibits for declaration .5 Complete revised Lesnik declaration .4 E-mail to Gregor .2	400.00/hr	1,120.00

Gregor Lesnik

Page 262

	<u>Rate</u>	<u>Amount</u>
Texts to and from Danijel		
.1		
Update list of supporting evidence for jurisdiction		
.5		
Discuss with staff slip sheets for exhibits		
.1 (partially charged)		
combine declaration with attachments for Rostohar declaration		
.1		
Review Papes signature page; call to Stjepan re alignment of pages, call with Stjepan, convert declaration to pdf and extract signature only page, e-mail to Stjepan, e-mail from Stjepan		
.5		
Review exhibits with cover page, discuss with staff revisions and redactions		
.1 (partially charged)		
Combine declaration with attachments for Papes declaration		
.1		
Prepare list of supporting evidence with reference to docket numbers		
.2		
3/31/2021 Locate filed redacted and unredacted exhibits, cross check		150.00
2.	75.00/hr	
discuss with staff slip sheets for exhibits for request for filing under seal		3,600.00
.1	400.00/hr	
prepare draft administrative motion to file under seal		
2.0		
prepare draft Request for Judicial Notice		
2.0		
review documents and exhibits for proposed Lesnik declaration, exhibits for declaration		
.5		
Complete revised Lesnik declaration		
.4		
E-mail to Gregor		
.2		
Texts to and from Danijel		
.1		
Update list of supporting evidence for jurisdiction		
.1		
E-mail from Holtzman		
.1		
Compare documents attached to Holtzman e-mail; Sort and save exhibits to file under seal		
.2		
Combine signature with pdf copy of declaration, combined with exhibits, save to file declaration of Rostohar		
.2		
Save to file Papes declaration		
.1		
Begin to prepare text for administrative motion to file brief in excess of 25 pages		
.3		

Gregor Lesnik

Page 263

	<u>Rate</u>	<u>Amount</u>
--	-------------	---------------

Review, revise and save updated caption

.1

Prepare checklist for exhibits

.2

Complete penultimate draft of administrative motion to file excess page brief

.3

Prepare proposed Order to file excess page brief

.2

Review civil local rule 7-3, complete to file administrative motion to file excess page brief

.2

Add to and update memo of jurisdictional facts showing personal jurisdiction of this Court over each of the defendants, with reference to exhibits

1.4

Add to draft request for judicial notice

.3

4/1/2021 Review previous Motions and exhibits, Slip sheet exhibits

2.

75.00/hr

150.00

review all prior filed Dresser declarations, confirm which are not slip sheeted for exhibits; identify which need to be updated

400.00/hr

1,160.00

.5

Prepare draft Dresser Declaration

2.0

discuss with staff exhibits

.1

Text to Gregor

.1

With staff assistance locate, save and name exhibits for Dresser Declaration

.2

4/2/2021 e-mail from Gregor, receive Gregor signature, use to complete to file declaration

400.00/hr

1,160.00

.1

Receive and pay invoice for translations

.1 (no charge)

sort and save documents for exhibits to Dresser Declaration

1.5

Add to Dresser Declaration in support of renewed motions for default judgments

1.0

Review exhibits, prepare memo re needed slip sheets

.3

4/3/2021 work on preparing MPA in support of three renewed motions for default judgments

400.00/hr

2,400.00

4.0

Research authorities for personal jurisdiction analysis

2.0

Gregor Lesnik

Page 264

	<u>Rate</u>	<u>Amount</u>
4/4/2021 work on preparing MPA in support of three renewed motions for default judgments 6.0 Complete proposed declaration of Travancic, e-mails to and from Travancic, call with Travancic .6	400.00/hr	2,640.00
4/5/2021 Assist with finalizing exhibits for Amended Motions and Motion Under Seal, prepared for filing 4.	75.00/hr	300.00
sort and save as additional exhibits welcome letters and tesla entry logs .3 Research and save formal internet notifications, reservations, and authoritative letters re Hague Convention on service abroad; save as exhibits 1.0 Research and save Brotto, LLC articles, license and insurance documents .5 calls with Travancic, receive signed declaration .1 Save insert re service by United Kingdom Process .1 Discuss with staff investigation re Branko Tomas .1 Discuss and review with staff update exhibits for declarations with cover pages .1 Complete to file administrative motion to file under seal 1.2 Complete proposed Order .3 Prepare draft supplemental declaration under seal for unredacted copies of exhibits .6 Prepare table of exhibits .2 Complete penultimate draft of Dresser Declaration referencing redacted copies of exhibits 1.7 Memo of revised update text for MPA re personal jurisdiction .6 Prepare Administrative Motion to file excess page briefs 1.0 Prepare proposed Order .1 Review and revise proposed Administrative motion, Save motion to pdf, revise proposed Order, save to pdf, e-file administrative motion and proposed Order .2 Review and revise Declaration in Support of Renewed Motions .7 Review and revise under seal version of Declaration	400.00/hr	4,160.00

Gregor Lesnik

Page 265

	<u>Rate</u>	<u>Amount</u>
.3 Revise declaration to file in public record		
.2 Further research and update draft insert re personal jurisdiction		
.8 Memo for staff re further steps to file declarations		
.3		
4/6/2021 Assist with finalizing exhibits for Amended Motions and Motion Under Seal, prepared for filing	75.00/hr	600.00
8		
review declaration with exhibits, sorting into multiple volumes, index of exhibits, and cover pages	400.00/hr	3,280.00
.8 Prepare draft request for judicial notice; research judicial finding of fact compared with judicial notice, update and revise request for judicial notice		
.6 Complete Request for Judicial Notice with logically ordered categories of requests and documents related to each category		
1.0 Organize exhibits to attach to request for judicial notice, re-number to fit RJN supporting renewed motions for default judgments		
.5 Discuss with staff updated revisions to exhibits in support of RJN		
.1 Discuss with staff index of exhibits, sorting declaration into parts based on size limits for filing		
.1 (partially charged) continue research and update memo re personal jurisdiction		
2.2 Update and save to file Rostohar declaration with exhibits		
.1 Save information re Vuzem and Vuzem entities in chronological order to insert argument re personal jurisdiction, and re alter ego status		
1.7 insert text for different parts of MPA on renewed motion for default judgment on coerced labor cause of action 9 and 10		
1.0 Receive Order granting administrative motion to file excess page briefs; save		
.1		
4/7/2021 worked on exhibits 301 through exhibits 414 for Volume 1 of Declaration of WCD in Support of Plaintiffs and Relators Gregor Lesnik and Stejepan Papes' Renewed Motions for Default Judgments	75.00/hr	300.00
4.		
call with Papes, discuss revision, prepare final version; e-mail to Papes	400.00/hr	2,400.00
.3 Research cases citing to Schwarzenegger decision		
.2 Research authorities for corporations being citizens of states		

Gregor Lesnik

Page 266

	<u>Rate</u>	<u>Amount</u>
.4 Add to and revise draft Renewed Motion for Judgment for Coerced Labor		
1.0 Add to declaration		
.4 Call and e-mail to Vandenberg		
.1 Calls and e-mails with Ruth Silver Taube		
.2 Complete penultimate draft of Renewed Motion for Judgment for Coerced Labor		
.2 Add to and revise draft Renewed Motion for Judgment for Wages individually, including revising calculations		
1.2 Revised motion re Coerced Labor, removing tables, adding back tables, and updating and correcting tables		
1.0 Add to and revise draft Renewed Motion for Judgment on FCA claims		
1.0		
4/8/2021 Assisted in 3 motions, locate supporting exhibits, prepare and convert documents, renaming exhibits and saved to server, double check serve addresses	75.00/hr	600.00
8. locate and remove duplicate text from motions, save memo re same		
.2 Complete Renewed Motion for Judgment for Coerced Labor	400.00/hr	2,480.00
1.2 Add to and revise draft Renewed Motion for Judgment on FCA claims		
1.0 Complete to file Renewed Motion for Judgment for Coerced Labor		
.3 Complete to file Papes declaration		
.2 Complete to file Declaration in seven volumes, working with staff		
.2 (partially charged) complete to file Lesnik declaration		
.1 Complete to file Request for Judicial Notice		
.2 Complete to file Travancic Declaration		
.1 Complete to file Divjak Declaration		
.1 Prepare insert for text on motion for FCA judgment		
.1 E-mail to Judge Kohs courtroom deputy and calendaring clerk re hearing dates; further e-mails regarding alternative hearing dates		
.1 E-file and assist staff to e-file renewed motion for judgment on coerced labor		

Gregor Lesnik

Page 267

		<u>Rate</u>	<u>Amount</u>
	claims, Dresser Declaration volumes 1 to 7, Papes Declaration, Lesnik Decl, Travancic Decl, RJN, Divjak Decl, and Rostohar Declaration .4 (partially charged) add to draft motion for default judgment on wages individually .5 add to draft motion for default judgment on FCA claims 1.5		
4/9/2021	Continued working on exhibits 9	75.00/hr	675.00
	Receive and review invoice from Notice of Related Cases Under Civil Code LR 3-12; Administrative Motion to Consider Whether Cases Should be Related; Supporting Declaration; and Notice to Parties of Removal to Federal Court	400.00/hr	40.00
	receive e-mail attachment of pleadings .1 Receive notice of, download, and save Administrative Motion to relate cases, proposed Order and proof of service; state court proof of service re removal, .3 Locate authorities re specific personal jurisdiction on FLSA wages claims based on California activities .2 Prepare insert for time of day and numbers of workers, with reference to class member declarations .2 Revise draft of motion for default judgment on wages individually; update tables; review exhibit of hours and calculation of amounts due, memo to calculate .7 complete penultimate draft of motion for default judgment on FCA claims; update tables, edit; complete to e-file and file Motion for Default Judgment on FCA claims 2.0 E-mails to clients re status of filing motions .2 E-mail to and from Hunter Pyle requesting review of proposed FLSA wages motion .1	400.00/hr	1,520.00
4/10/2021	review declarations to file under seal, review administrative motion to file under seal, revise proposed motion 1.0	400.00/hr	400.00
4/11/2021	memo re exhibits to file under seal, locate exhibits for administrative motion and for attachment to declaration to file under seal; review and revise to complete administrative motion to file under seal, prepare for filing; prepare proposed Order, prepare to file; prepare for filing declaration to file under seal 2.0 complete to file renewed motion for default judgment, FLSA wages, including correction of spreadsheet attachment, adding references to support subject	400.00/hr	2,480.00

Gregor Lesnik

Page 268

		<u>Rate</u>	<u>Amount</u>
	matter jurisdiction and personal jurisdiction		
	2.5		
	prepare drafts of proposed Orders		
	.5		
	Print and begin to sort copies for mailed service		
	1.0 (partially charged)		
	confirm declaration under seal not viewable in public record		
	.1		
	e-mail to counsel attaching copy of declaration filed under seal		
	.1		
4/12/2021	Gathered all documents for 11 defendants, prepared customs forms for all Slovenia, and England and prepared documents for service	75.00/hr	600.00
	8		
	complete to file all proposed orders on three renewed motions for default judgment	400.00/hr	1,920.00
	1.5		
	Locate information re Branko Tomas, discuss with staff investigation of potential addresses for Tomas		
	.2		
	Revise and complete proof of service of motions		
	.3		
	Organize and save proofs of service and proposed Orders for e-filing, prepare list		
	.1		
	Assist in e-filing		
	.1		
	assist in completing organization of all pleadings for service		
	.5		
	Assist in completing documents for postal service to foreign country citizens		
	.3		
	mail to post office		
	1.0 (level 3)		
	receive e-notice of filings		
	.1		
	save copies of filed pleadings		
	.2		
	Discuss with staff saving tracking information		
	.1		
	Prepare draft letter to Judge Koh		
	.2		
	E-mail to Judge Koh with attachments		
	.1		
	E-mail to clients re final filed status, attach renewed FLSA wages claims and all proposed order		
	.1		
4/13/2021	download, save and print filed proposed Orders, filed Proofs of Service	400.00/hr	120.00
	.1		
	Direct printing of copies for court		
	.1		

Gregor Lesnik

Page 269

		<u>Rate</u>	<u>Amount</u>
	E-mail to Stjepan with filed copies of renewed FLSA motion and filed proposed Order .1		
4/14/2021	Receive and review Declaration of Bernay in support of administrative Motion by plaintiff's for leave to file under seal supplemental declaration in support of plaintiffs renewed motions for default judgment; Order granting motion to relate Order re Case Management	400.00/hr	40.00
	discuss with staff information re new or additional address for HRID-Mont, d.o.o. and for Ivan Vuzem .1	400.00/hr	40.00
4/15/2021	Prepared Supplemental Proof of Service for Plaintiffs and Relators Gregor Lesnik And Stjepan Papes' Renewed Motion for Default Judgment on Cause of Action 1: False Claims Act; Supplemental Proof of Service for Plaintiffs and Relators Gregor Lesnik And Stjepan Papes' Renewed Motion for Default Judgment on Cause of Action 9 Trafficking and Coerced Labor Under TVPRA; and Supplemental Proof of Service for Plaintiff Stjepan Papes' Renewed Motion as An Individual for Default Judgment on Causes of Action 2 and 3 Flsa Wages Prepared documents for International shipping to Ivan Vuzem, gathered documents and prepared for delivery to Judges Chambers 4	75.00/hr	300.00
	discuss with staff making copies of pleadings for court; copies and supplemental service on new address for Ivan Vuzem .2	400.00/hr	80.00
4/16/2021	deliver to court drop box courtesy copies of pleadings for Judge Koh .3 Receive Amended Clerk Notice, save, print .1 Update calendar .1	400.00/hr	200.00
4/19/2021	Personally, delivered renewed motions to US Post Office .4 level 3	45.00/hr	18.00
	review draft supplemental proof of service of motions on Ivan Vuzem and new address; review, revise and execute same; e-file .3 E-mail from Divjak, review attached re-attempt at service (unclaimed) .1 E-mail to Stjepan and Gregor re status of unsuccessful service attempt .1	400.00/hr	200.00

Gregor Lesnik

Page 270

		<u>Rate</u>	<u>Amount</u>
4/20/2021	Receive and review Order Dismissing Without prejudice defendant D2N Tehnologije d.o.o. Certificate of Service	400.00/hr	40.00
	discuss with staff obtaining postal tracking history for served renewed motions .1 Receive Order dismissing D2N, save; e-mail to clients .1	400.00/hr	80.00
5/4/2021	discuss with staff status of and saving proof of mailing copies of motions for default judgments .1	400.00/hr	40.00
5/10/2021	e-mail from counsel for Eisenmann; review draft Joint CMC Statement .2	400.00/hr	80.00
5/11/2021	Receive and review Order granting in part and denying in part motion to compel enforcement of settlement; Order granting in part and denying in part motions to file under seal; Joint case management conference statement	400.00/hr	40.00
5/12/2021	Receive and review Eisenmann's opposition to plaintiff's motion to compel enforcement of settlement; clerks notice continuing Case Management Conference; Declaration of Aaron Bernay supporting opposition; and declaration of Cassiano Fabris supporting opposition	400.00/hr	40.00
	e-mails with counsel, revise draft Joint Case Management Statement; complete to file Joint CMC Statement 1.0	400.00/hr	400.00
5/13/2021	review and save defendant's opposition to motion to enforce settlement - memorandum, declaration of Bernay, declaration of Fabris .2 receive Order on motion to compel enforcement of settlement; review same .2 Receive Order re filing under seal .1 Memo re Order for redactions .1 E-mail to counsel for Eisenmann re what to file under seal .1	400.00/hr	280.00
5/17/2021	receive e-notice of Order and Order on mtn to compel enforcement of settlement, download, save and review .1 receive e-notice of Order and Order on application to file under seal, download, save and review .1	400.00/hr	80.00

Gregor Lesnik

Page 271

		<u>Rate</u>	<u>Amount</u>
5/17/2021	create postage history in Excel from 2020 to 5/17/2021 .5	75.00/hr	37.50
5/19/2021	review in detail e-mail from Gregurec agent for service .1 Locate UK official records for Gregurec, Ltd., review, download and save .2 E-mail to Luka Divjak re requested collection .1	400.00/hr	160.00
5/20/2021	discuss with staff locating and saving USPS tracking information .1	400.00/hr	40.00
	Prepared tracking information on 12 international mailings, saved to server .9	400.00/hr	360.00
5/24/2021	Organize file 1.	400.00/hr	400.00
5/27/2021	Receive and review Reply to MPA's in support of motion to compel enforcement of settlement filed on 12/15/2020	400.00/hr	40.00
6/18/2021	Receive and review renewed motion sent to Ivan Vuzem on 4/19/2021 were returned damaged with a note from the San Francisco Post Office Network Distribution Center apologizing for the damage done to our shipment.	400.00/hr	40.00
6/23/2021	Review Entry for Defaults files, begin preparation for tracking for defendants for Supplemental Proof of Service 4	75.00/hr	300.00
	research local rules re Covid .2 Review and direct filing of supplemental proofs of service .1	400.00/hr	120.00
6/24/2021	Gather tracking information on all defendants relating to Entry of Default Judgment for Supplemental Proofs of service, prepare tracking information for exhibits, prepare cover pages, prepare Supplemental, save all to server, efile 3.	75.00/hr	225.00
	assist staff in gathering information for, prepare supplemental proof of service, and e-filing .1	400.00/hr	40.00
6/25/2021	receive e-notice of filing Supplemental Proofs of Service .1	400.00/hr	40.00
7/1/2021	receive e-notification of continuance of CM Conference, download and save, re-calendar .1	400.00/hr	40.00

Gregor Lesnik

Page 272

		<u>Rate</u>	<u>Amount</u>
7/14/2021	discuss with staff service attempts and return documents .1	400.00/hr	40.00
7/16/2021	research new standards for calculating meal and rest break pay; memo to file .1	400.00/hr	40.00
7/22/2021	Federal website to cross check filed pleadings and organized file 1.	75.00/hr	7.50
8/3/2021	e-mail to Stjepan, Gregor and Danijel regarding a Slovenian attorney and conference call in related Maslic matter; e-mail to Divjak re same .1	400.00/hr	40.00
8/4/2021	e-mail from Papes, e-mail from Divjak .1	400.00/hr	40.00
8/10/2021	Receive and review Clerk's notice vacating August 12, 2021 and August 19, 2021 hearings	400.00/hr	40.00
	receive, save, and review Order vacating hearing dates, e-mail to clients .1	400.00/hr	40.00
8/12/2021	e-mail to Divjak re status .1	400.00/hr	40.00
8/24/2021	receive e-mail from Palmer, open, save and review forwarded Order in similar case (Franchitti), evaluate application and compare to which Order in Lesnik is referred to; memo to file .3 E-mail to Palmer .1 E-mail to clients .1	400.00/hr	200.00
8/25/2021	e-mail from Stjepan, have translated, call with Stjepan .4 Review Franchitti Order again .1 E-mail to clients .1 Review Order re motion to file under seal, locate unopened e-mail from defense counsel from May 13, compare counsel's request with Order, redact exhibits as noted, revise caption and signature based on Order, double check for accuracy as to counsel's requests, save in pdf, combine declaration with exhibits 1.8 E-mail to counsel .1 Call to counsel Holtzman .1 Call with Hunter Pyle .1	400.00/hr	1,360.00

Gregor Lesnik

Page 273

		<u>Rate</u>	<u>Amount</u>
	Prepare Notice of Supplemental Authority .5 Prepare proof of service .2		
8/25/2021	Download email from Papes, translated email .2	75.00/hr	15.00
8/26/2021	e-mail from Holtzman .1 Attempt to e-file revised declaration from Holtzman .1 Review and revise with redactions attachments to WCD declaration .4 E-mail to Holtzman .1 Discuss with staff service by mail .1 E-file Notice of Supplemental Authority and proof of service .1 E-mail to clients .1	400.00/hr	400.00
	Review 3-year international reports from Stamps.com, Served 12 defendants, international and domestic, Notice of Supplemental Authority on Plaintiffs and Relators Gregor Lesnik and Stjepan Papes Renewed Motion for Default Judgment on Cause of Action 1: False Claims Act 2.5	75.00/hr	187.50
8/27/2021	e-mail from Holtzman .1 Attempt to e-file, call with ecf support, revise pdf document; re-save, file MPA, Reply MPA and Declaration per Order .2 Download, save and print e-notice and filed documents .1 Attempted calls with Jay Palmer .1 (no charge)	400.00/hr	160.00
9/7/2021	Receive and review ISM Vuzem returned documents & letter from Secretary of State re Service	400.00/hr	40.00
9/8/2021	Receive and review confirming and tracking information from USPS	400.00/hr	40.00
9/17/2021	Receive and review order Granting in part and denying third motion for default judgment	400.00/hr	40.00
9/20/2021	receive e-notice of and Order on motion for default judgment on coerced labor claims, download and save, review .2 E-mail to clients	400.00/hr	160.00

Gregor Lesnik

Page 274

		<u>Rate</u>	<u>Amount</u>
	.1 E-mail from Stjepan .1		
9/21/2021	e-notice of Order on FLSA claims, save, download, print, review .2 E-mail to clients .1 E-mail from and to Gregor re distributions .1 E-mail from Stjepan about when to collect .1 Save prior e-mails .1 (no charge)	400.00/hr	200.00
	receive Judgment on FLSA claims, download, save .1 E-mails with Papes .1 E-mail from Gregor .1 Receive Order on mtn to file under seal .1	400.00/hr	160.00
	Receive and review Order Granting in Part Administrative Motion to File under Seal	400.00/hr	40.00
9/22/2021	review orders, calendar due dates .1	400.00/hr	40.00
9/23/2021	review Order re redactions and filing under seal; locate referred to exhibits, evaluate potential reconsideration as to some information and decide not to seek court review of order; save unredacted copy of exhibits, revise declaration, combine declaration with exhibits; memo re sorting into sizes of volumes to be able to e-file 1.0 review motions, responses and orders in US ex rel Lesnik and related case of Maslic, identify Dkt numbering, identify dates; prepare draft Joint Case Management Statement 1.0 E-mail to counsel for Eisenmann and Tesla .1 E-mail from counsel Bernay .1 Multiple e-mails with Stjepan and Gregor .1 (partially charged)	400.00/hr	920.00
	Receive and review Order to File a Joint Case Management Statement	400.00/hr	40.00

Gregor Lesnik

Page 275

		<u>Rate</u>	<u>Amount</u>
9/24/2021	save e-mail from counsel for Eisenmann, copy text of e-mail for insert; revise CM Statement based on Eisenmann not participating or joining in filing; review and revise for filing .4 Discuss with staff completing for filing Declaration following issuance of Order re redactions and filing under seal, including reviewing exhibit list .1 (partially charged) call with ecf support about filing volumes of exhibits .1 (no charge) review entries re Maslic case, complete and e-file Plaintiff's Case Management Conference Statement .2 E-mail to Stjepan, Gregor and Danijel .1 Research Innova Solutions appellate opinion reversing decision by Magistrate Judge DeMarchi that had granted judgment for USCIS on claim of denial of H-1B visa was arbitrary .1 E-mail notice of continuing CM Conference; download and save; update calendar .1	400.00/hr	400.00
	Receive and review Plaintiff's Case Management Conference Statement filed on 9/24/2021	400.00/hr	40.00
	Prepared Exhibit covers and split declaration for default motion, prepared 7 volumes for filing 3.	75.00/hr	225.00
9/26/2021	multiple e-mails from Stjepan .1 Review prior e-mails by Gregor .1 Review prior e-mails by Stjepan .1 have Elma translate texts and review translations of e-mails .2 Save translation .1 Conference with Danijel .1	400.00/hr	280.00
9/28/2021	Receive and review Pleadings mailed out on 8/26/2021, to Ivan Vuzem, Robert Vuzem, and ISM Vuzem were returned.	400.00/hr	40.00
10/1/2021	research recent decisions re meal and rest period premiums .4	400.00/hr	160.00
10/5/2021	review and direct save of audio between Gregor and the Vuzems .1 Review research on time period to file motion for fees, prepare draft insert with citations to authorities	400.00/hr	240.00

Gregor Lesnik

Page 276

		<u>Rate</u>	<u>Amount</u>
	.4 Discuss with staff saving in digital form proof of mailings to and return from Vuzems .1		
10/5/2021	organize and file pleadings brining pleadings current 2. scanned all returned pleading envelopes .5	75.00/hr	187.50
10/6/2021	organizing and preparing spreadsheet of returned pleadings 2.	75.00/hr	150.00
10/9/2021	review Order, identify portions to use as text in Amended Renewed Motion, identify mis-statement of law and needed research, identify issues for calculation of wages for Papes' FLSA wages claims 1.5 review research re recent changes in calculating unpaid wages for meal breaks and for OT .1 begin to prepare amended motion .1 Evaluate how to prepare spreadsheet to calculate damages .1 E-mail to Stjepan .4	400.00/hr	880.00
10/10/2021	text from, and texts to, Papes .1	400.00/hr	40.00
10/11/2021	Create spreadsheet, update returned pleadings 1.5 1.0 Add inserts of text to draft Amended Renewed Motion for FLSA wages .5	75.00/hr 400.00/hr	112.50 600.00
10/12/2021	e-mails with Stjepan re information for calculating wages, revisions to declaration and re pending motion .4 prepare final version of further declaration in support of judgment on FLSA wages claims; convert to pdf; update date and time information; e-mail to Papes 1.0	400.00/hr	560.00
10/13/2021	e-mail to clients .1 (no charge)	400.00/hr	NO CHARGE

Gregor Lesnik

Page 277

		<u>Rate</u>	<u>Amount</u>
10/17/2021	continue to outline motion and additions and changes to FLSA wages claims by Papes 5.0	400.00/hr	2,000.00
10/18/2021	e-mail to courtroom deputy and calendaring clerk for Judge Koh .1 Continue re-drafting FLSA motion for default judgment 6.0	400.00/hr	2,440.00
10/19/2021	e-mail to clerk to obtain hearing date, e-mail from clerk, calendar hearing date and due dates, e-mail to clerk .1 complete to file Motion for Entry of Default Judgment on FLSA claims, including text, references to evidence, tables, and creation of attachment of calculations; prepare Proposed Order in Word and in pdf, prepare to file Supplemental Declaration of Papes; organize all pleadings, prepare to e-file and e-file 6.5 E-mail to Judge Koh attaching proposed Order .1 E-mail to Papes .1	400.00/hr	2,720.00
10/20/2021	Updated Caption .1 Prepared Notice of Change of Address .2 Prepared Proof of Service .2 e-mail with client .1	75.00/hr 400.00/hr	37.50 40.00
10/22/2021	Receive and review Notice of Change of address filed on 10/22/2021	400.00/hr	40.00
11/5/2021	Receive and review Notice of related cases and supporting declaration filed on 11/5/2021	400.00/hr	40.00
11/8/2021	Receive and review Certificate of service filed on 11/8/2021 receive notice of administrative motion to relate Novoselec case, and certificate of service .1	400.00/hr 400.00/hr	40.00 40.00
12/17/2021	Receive and review Clerk Notice of change in assignment, meet and confer, and filing consent to magistrate or request for re-assignment to district judge	400.00/hr	40.00

Gregor Lesnik

Page 278

		<u>Rate</u>	<u>Amount</u>
12/17/2021	receive notice from court of re-assignment .1	400.00/hr	80.00
	E-mail to counsel re stipulation to magistrate judge .1		
	Receive and review Clerk Notice of change in assignment, meet and confer, and filing consent to magistrate or request for re-assignment to district judge	400.00/hr	40.00
12/27/2021	e-mail from counsel for Eisenmann .1	400.00/hr	40.00
1/4/2022	Receive and review Filed copy of Request for Re-Assignment to District Judge	400.00/hr	40.00
1/18/2022	e-mail from Gregor, translate, prepare reply e-mail, translate .1	400.00/hr	40.00
1/24/2022	receive e-notice of Order, download, save and review order, change calendaring .1	400.00/hr	120.00
	E-mail from Papes .1		
	Review Slovenian statutes .1		
	E-mail to Papes and to Gregor and Danijel .1		
1/29/2022	receive and save e-notice of rescheduling CMC, calendar .1	400.00/hr	80.00
	E-mail to clients re status .1		
1/31/2022	prepare list of defendants named in TAC 1.0	400.00/hr	600.00
	e-mail from counsel for Eisenmann .1		
	Prepare Status Report .3		
	E-file; receive confirmation, download and save .1		
2/15/2022	e-mail from Papes, e-mail to Papes .1	400.00/hr	40.00
2/28/2022	review Judge Freeman standing orders and scheduling orders .1	400.00/hr	1,200.00
	Prepare draft letter to clerk to set hearing .1		
	Review Papes Declaration, revise caption .2		
	E-mail to Papes .1		

Gregor Lesnik

Page 279

		<u>Rate</u>	<u>Amount</u>
	Review all prior Orders on motions for default judgments, prepare draft amend motion for Papes FLSA claims particularly copying text of prior orders were relevant, changing caption, and updating Table of Contents 2.5		
3/1/2022	e-mail from Papes, e-mail to Papes .1 Review draft motion .2	400.00/hr	120.00
3/7/2022	consider steps to complete all motions .1 (partially charged)	400.00/hr	40.00
3/14/2022	e-mail from and to Papes .1	400.00/hr	40.00
3/30/2022	review notes for initial contact with Stjepan Papes .1 Generate History Report for fee motion .2	400.00/hr	120.00
3/31/2022	discuss with staff redaction of attorney History Report for motions for recovery of fees .2	400.00/hr	80.00
4/27/2022	receive sub of attys for co-counsel for Eisenman GmbH .1	400.00/hr	40.00
5/2/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 4.0	75.00/hr	300.00
5/4/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 3.0 Update Memo regarding information that could be added to Papes Declaration 1.0	75.00/hr	300.00
5/5/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.5	75.00/hr	187.50
5/9/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.0	75.00/hr	150.00
5/11/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.0	75.00/hr	75.00
5/12/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.0 Update Memo regarding information that could be added to Papes Declaration .5	75.00/hr	187.50

Gregor Lesnik

Page 280

	<u>Rate</u>	<u>Amount</u>
5/13/2022 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.5	75.00/hr	187.50
5/15/2022 Prepare Plaintiffs' Case Management Statement 1.0	400.00/hr	400.00
Receive and review Plaintiffs and Relators' Case Management Conference Statement filed on 5/17/2022	400.00/hr	40.00
5/16/2022 e-mail to Lesnik and Papes re status .1	400.00/hr	40.00
5/17/2022 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.5	75.00/hr	187.50
5/20/2022 Receive Minute Entry for CMC, calendar further CMC .1	400.00/hr	40.00
5/21/2022 zoom call with client Papes .5	400.00/hr	200.00
5/24/2022 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.5	75.00/hr	112.50
5/31/2022 Review form spreadsheets and spreadsheet information for wage calculations, search California Labor Commissioner website for spreadsheet (no longer have in printable form, it is all auto-filled and auto-calculated) .6 Prepare initial spreadsheet .3 Discuss information available, review Papes declarations, locate memos and notes from client Papes, revise different versions of spreadsheet based on FLSA, exemption from Portal-to-Portal Act, California wages, and weekly exemplar plus full duration of pay .6	400.00/hr	600.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.0	75.00/hr	75.00
6/1/2022 Direct preparation of spreadsheets .1	400.00/hr	40.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.5	75.00/hr	112.50
6/2/2022 Discuss data and calculations for spreadsheets .1	400.00/hr	40.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.5	75.00/hr	112.50

Gregor Lesnik

Page 281

		<u>Rate</u>	<u>Amount</u>
6/6/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.5	75.00/hr	112.50
6/8/2022	Discuss preparation of spreadsheets for FLSA claims of Papes .2 Discuss information omitted by Papes in prior declarations .1 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.0	400.00/hr 75.00/hr	120.00 150.00
6/9/2022	Review status of spreadsheets for Papes FLSA damages .1	400.00/hr	40.00
6/13/2022	Discuss with staff information not included on Papes declaration, and memo to summarize gaps .1	400.00/hr	40.00
6/14/2022	Memo re: Research attorney fees on default judgments in federal court .1	400.00/hr	40.00
6/15/2022	Review status of spreadsheets for Papes .1	400.00/hr	40.00
6/16/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.5	75.00/hr	187.50
6/20/2022	Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 3.0 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 4.0	75.00/hr 75.00/hr	225.00 300.00
6/21/2022	Review spreadsheets for Papes .1	400.00/hr	40.00
6/22/2022	e-mail from Papes, prepare draft e-mail to Papes .1	400.00/hr	40.00
6/23/2022	Research re attorneys fees and re default judgments 1.0 Review charts, complete e-mail to Papes .1	400.00/hr	440.00
6/27/2022	Discuss with staff spreadsheets .1 (no charge) Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.5	400.00/hr 75.00/hr	NO CHARGE 112.50

Gregor Lesnik

Page 282

	<u>Rate</u>	<u>Amount</u>
6/29/2022 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 2.5	75.00/hr	187.50
6/30/2022 Review time spreadsheets, e-mail to Papes Review research re default judgments and attorneys fees .1	400.00/hr	40.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 3.5	75.00/hr	262.50
7/6/2022 Review draft spreadsheets for time, make revisions, identified further revisions .1	400.00/hr	40.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 1.0	75.00/hr	75.00
7/7/2022 Review time spreadsheets, make revisions to categorization .1 (partially charged)	400.00/hr	40.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 4.5	75.00/hr	337.50
7/11/2022 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 4.0	75.00/hr	300.00
7/12/2022 e-mail to Papes .2 Review research re default judgments and attorneys fees .1	400.00/hr	120.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 4.0	400.00/hr	1,600.00
7/13/2022 Discuss with staff further actions to file motion .1	400.00/hr	40.00
7/14/2022 Call to and text to Stjepan .1 (no charge) Call with Stjepan, memo to file .4	400.00/hr	160.00
7/18/2022 Discuss revisions to Papes declaration and to spreadsheets based on information from client .2	400.00/hr	80.00
Prepare draft spreadsheet for overtime hours worked for Stjepan Papes .5	400.00/hr	200.00

Gregor Lesnik

Page 283

		<u>Rate</u>	<u>Amount</u>
7/20/2022	Discuss with staff need for clarifying information .1 Call with Papes .3 Prepare draft spreadsheet for overtime hours worked for Stjepan Papes 3.5	400.00/hr	160.00 1,400.00
7/21/2022	Discuss language for spreadsheets .1 Discuss updates and revisions for spreadsheets .1 Assist with revisions for further supplemental declaration of Papes .5	400.00/hr	280.00
7/25/2022	Call with Stjepan, revise and add to declaration, revise spreadsheets .3 Discuss with staff completion of this declaration and these spreadsheets, and saving for spreadsheets that do not include travel to and from sites .1	400.00/hr	160.00
7/26/2022	e-mail from Papes .1	400.00/hr	40.00
8/9/2022	e-mail from Jay Palmer, download, save and review opinion .1 e-mail to Gregor, Stjepan and Daniel .1 Discuss with staff completing Papes spreadsheets that do not claim travel time .1 Prepare FLSA Wages Single Week for Stjepan Papes not including travel time 2.5	400.00/hr 75.00/hr	120.00 187.50
8/10/2022	.3 Discuss with staff time sheets that do not include any portal to portal time .1 Prepare FLSA Wages Single Week for Stjepan Papes not including travel time 3.0	400.00/hr 75.00/hr	160.00 225.00
	For professional services rendered	3338.35	\$870,419.25

Gregor Lesnik

Page 284

Additional Charges :

	<u>Amount</u>
3/7/2016 Actual court filing fees - initial fee to US District Court	400.00
3/31/2016 Actual outside service costs - certified mail on USAG	26.80
5/23/2016 Office copying at .15 per page	10.80
Postage and mailing at actual cost	2.20
6/8/2016 Office copying at .15 per page	3.00
6/16/2016 Travel costs- parking \$29, mileage 2 x 50 x .50 = \$50	79.00
10/11/2016 Office copying at .15 per page	1.20
Postage and mailing at actual cost	0.47
to consultant Jay Palmer	3,000.00
1/27/2017 Office copying at .15 per page	0.75
Postage and mailing at actual cost	0.47
7/24/2017 Office copying at .15 per page	1.50
8/8/2017 index tabs	101.28
9/28/2017 Postage and mailing at actual cost	38.00
10/16/2017 obtain corporate records: PA corporate fees, records, \$159.00	1,232.46
18US ex rel Lesnik, business records, 82.82	
18US ex rel Lesnik, business records, 423.53	
18US ex rel Lesnik, business records, 72.81	
19US ex rel Lesnik, business records, 274.54	
19US ex rel Lesnik, business records, 59.50	
21US ex rel Lesnik, business records, 56.54	
24US ex rel Lesnik, business records, 82.72	
24US ex rel Lesnik, business records, Alabama for D2N, \$21	
10/18/2017 Office copying at .15 per page	10.20
10/19/2017 Office copying at .15 per page	4.50
10/27/2017 Office copying at .15 per page	9.00
10/30/2017 Office copying at .15 per page	0.90
10/31/2017 Office copying at .15 per page	3.00

Gregor Lesnik

Page 285

	<u>Amount</u>
11/1/2017 Postage and mailing at actual cost	123.01
11/14/2017 Postage and mailing at actual cost	68.79
11/29/2017 consultation fee to Jay Palmer	5,000.00
12/28/2017 to Jay Palmer for consulting fees	10,000.00
1/7/2018 Postage and mailing to co-counsel, FedEx, \$50.31	50.31
1/18/2018 Volkswagen - Service on Registered Agent	39.95
1/19/2018 Actual outside service costs for Eisenmann SE -Service on Registered Agent	39.95
Actual outside service costs for Eisenmann Anlagenbau GmbH - Service on Registered Agent	39.95
Actual outside service costs for Eisenmann Anlagenbau Verwaltung GmbH - Service on Registered Agent	39.95
Actual outside service costs for Eisenmann Corp - Service on Registered Agent	39.95
Actual outside service costs for Tesla Motors, Inc. - Service on Registered Agent	39.95
1/20/2018 Actual outside service costs on VW, in Sacramento, California, OneLegal	39.95
FedEx Postage and mailing at actual cost	24.17
1/22/2018 Actual outside service costs Dalmier AG -Service on Registered Agent	39.95
Fed Ex Postage and mailing at actual cost	24.17
1/27/2018 Office copying at .15 per page	2.40
Postage and mailing at actual cost	1.15
1/29/2018 Actual outside service costs - by UK Process on Gregurec	375.00
2/1/2018 Actual outside service costs for Lax Fabricating Ltd. - National Process Serving - Standard	169.95
2/2/2018 Actual outside service costs. Keystone	69.95
2/3/2018 Actual outside service costs for attempted service on Magma, Intl, OneLegal	169.95
Actual outside service costs for attempted service on service on LaX Mechanical in Minnesota, OneLegal	169.95
Postage and mailing at actual cost, Fed Ex	27.34
2/6/2018 Actual outside service costs for Additional Service Attempts - Standard	69.95

Gregor Lesnik

Page 286

	<u>Amount</u>
2/9/2018 Actual outside service costs for Mercedes-Benz US International, Inc. - National Process Serving - Standard	169.95
Actual outside service costs for Phoenix Mechanical - National Process Serving - Standard	169.95
Actual outside service costs for Rehau Incorporated - Service on Registered Agent	95.95
2/10/2018 Actual outside service costs on Mercedes, in Alabama, OneLegal	169.95
Actual outside service costs on Phoenix Mechanical in Taos, NM, One Legal	169.95
Actual outside service costs on on Rehau, by service on CT Corporation in Virginia, OneLegal	95.95
2/12/2018 translation from English into Croatian by Fibular-SLBd.o.o.	1,841.04
2/14/2018 Actual court filing fees, One Legal	462.06
2/21/2018 translation into Slovenian by Lingua-Soft	2,342.49
Office copying at .15 per page	21.60
Postage and mailing at actual cost	11.11
2/28/2018 Actual outside service costs for Citic Dicastal Co., Ltd - Process Serving - Standard	69.95
Actual outside service costs ISM Vuzern USA, INC. - Serve Failed	69.95
Postage and mailing at actual cost	16.80
3/1/2018 Office copying at .15 per page	37.20
Actual outside service costs Magma Int. - Serve Failed	69.95
3/6/2018 Office copying at .15 per page	7.95
Postage and mailing at actual cost	10.89
3/8/2018 Office copying at .15 per page	1.50
3/13/2018 Office copying at .15 per page	4.95
3/20/2018 Office copying at .15 per page	7.20
3/21/2018 Office copying at .15 per page	4.80
3/22/2018 Office copying at .15 per page	9.60
3/23/2018 Office copying at .15 per page	26.25

Gregor Lesnik

Page 287

	<u>Amount</u>
3/26/2018 Actual outside service D2N Tehnojogje d.o.o. aka D2N d.o.o. - Serve Failed	69.95
4/17/2018 Actual outside service costs. Elite Process Serving, Inc., service on Eisenmann German entities (3)	225.00
4/18/2018 Actual outside service re Eisenmann Corporation	40.00
Office copying at .15 per page	6.30
4/24/2018 Actual outside service re Bayerische Motoren Werke	140.00
4/25/2018 Actual outside service costs service on BMW in South Carolina, OneLegal	140.00
4/26/2018 Intellius	17.04
5/3/2018 Actual outside service costs service on DiCastal in Michigan, [delayed billing and confirmation report from OneLegal	175.00
5/12/2018 Online research re Wisconsin Department of Financial Institutions	10.00
5/16/2018 Office copying at .15 per page	30.60
Postage and mailing at actual cost	19.56
5/17/2018 Office copying at .15 per page	68.25
Postage and mailing at actual cost	29.38
Actual outside service costs service on Vuzem USA, Inc, OneLegal	55.00
5/22/2018 Actual court filing fees Summons, Second Amended Complaint, Order Granting Administrative Motion	75.00
5/23/2018 Office copying at .15 per page	122.85
Postage and mailing at actual cost	45.76
6/28/2018 Actual court filing fees Witness Fees, Summons&Complaint, Order Granting Administrative Motion	51.30
Actual court filing fees Summons, second Amended Complaint, Order	51.30
6/29/2018 Outside copying at actual cost - FOIA, Spartanburg County, deposit # 1	30.41
7/2/2018 Outside copying at actual cost - FOIA, Spartanburg County, deposit # 2	12.50
7/5/2018 Office copying at .15 per page	0.15
Postage and mailing at actual cost	0.48

Gregor Lesnik

Page 288

	<u>Amount</u>
7/12/2018 Outside copying at actual cost, FOIA, Spartanburg County, BMW, balance	128.73
7/16/2018 to Marjan Aleksic, 717.12 + 35 wire fee	752.12
7/17/2018 translation into Croatian, Fibula-SLB 46.16 + 35 wire fee	81.16
8/6/2018 Pacer	86.90
8/14/2018 Office copying at .15 per page	45.00
8/30/2018 Postage and mailing at actual cost	46.71
10/4/2018 loan to Papes	3,000.00
10/5/2018 wire fee for payment to Foster, PC	30.00
10/9/2018 Office copying at .15 per page	10.80
10/10/2018 Office copying at .15 per page	4.80
10/21/2018 Office copying at .15 per page	12.90
10/29/2018 Office copying at .15 per page	14.70
wire fee for funds to Papes	45.00
10/30/2018 Office copying at .15 per page	17.10
Outside copying at actual cost - Alameda Superior Court records	33.50
10/31/2018 Office copying at .15 per page	0.90
11/1/2018 Office copying at .15 per page	16.50
Office copying at .15 per page	0.45
11/5/2018 Actual outside service costs Brandywine Process Service, service on Volvo Car US Operations, Inc., \$69	69.00
Actual outside service costs Brandywine Process Service, service in Delaware on Eisenmann SE, \$39	39.00
Actual outside service costs Brandywine Process Service, service on Eisenmann Anlagenbau GmbH & Co. KG, \$39	39.00
Actual outside service costs Brandywine Process Service, service on Eisenmann Anlagenbau Verwaltung GmbH, \$39	39.00
Actual outside service costs Elite Process Serving, service in Illinois on Eisenmann SE, \$75	75.00

Gregor Lesnik

Page 289

	<u>Amount</u>
11/5/2018 Actual outside service costs Elite Process Serving, service in Illinois on Eisenmann Anlagenbau GmbH & Co. KG, \$75	75.00
Actual outside service costs Elite Process Serving, service in Illinois on Eisenmann Anlagenbau Verwaltung GmbH, \$75	75.00
Actual outside service costs Process Service Associates, service in California on Eisenmann SE, \$49.50	49.50
Actual outside service costs Process Service Associates, service in California on Eisenmann Anlagenbau GmbH & Co. KG, \$49.50	49.50
Actual outside service costs Process Service Associates, service in California on Eisenmann Anlagenbau Verwaltung GmbH, \$49.50	49.50
11/7/2018 translation of Third Amended Complaint into Croatian	3,046.00
wire transfer to Fibular SLB doo for translation	45.00
11/8/2018 Actual outside service costs - UK Service for service on Gregurec	375.00
11/15/2018 mediation travel fees for Papes, via eTours (for initial flight tickets)	1,289.00
wire transfer fee	45.00
11/26/2018 wire transfer fee	30.00
11/29/2018 Travel costs- travel to and from San Francisco for meeting with Walter Walker and firm, \$117.80 + 110.78	228.58
12/10/2018 Travel costs- Expedia, for Gregor travel to and from mediation, \$1,526.63, + \$10.35, + \$99.00	1,635.98
Travel costs- flight ticket for Stjepan Papes to fly return Frankfurt to Zagreb when denied entry to US for mediation, lost when learned visa cancelled	661.00
12/19/2018 Office copying at .15 per page	31.24
12/20/2018 Office copying at .15 per page	0.60
12/27/2018 Office copying at .15 per page	85.50
Postage and mailing at actual cost	7.98
Office copying at .15 per page	6.00
12/28/2018 Travel costs- to and from San Francisco	NO CHARGE
12/31/2018 for flight tickets for Stjepan Papes, second set, for travel to mediation	661.00
wire fee	45.00

Gregor Lesnik

Page 290

	<u>Amount</u>
1/7/2019 Postage and mailing at actual cost, international mailing of Rule 4 Waivers	351.00
Postage and mailing at actual cost - of proposed Waivers of Service	351.00
2/6/2019 Outside copying at actual cost - National Archives, deposit for records request, Eisenmann v Durr	90.00
2/7/2019 Actual outside service costs - US Postal Service, on Vuzem entity in S Carolina	20.50
Actual outside service costs, by certified mail	20.50
2/11/2019 Outside copying at actual cost - Kyckr, Registry [EBR Direct], corporate records	36.41
2/13/2019 Actual outside service costs - on Vuzem entity in US	126.65
2/14/2019 Office copying at .15 per page	2.70
Office copying at .15 per page	0.75
Outside copying at actual cost - AJPES, Ljubljana, corporate records	5.28
Outside copying at actual cost - corporate records	5.28
2/15/2019 Office copying at .15 per page	100.05
Office copying at .15 per page	51.75
2/19/2019 Outside copying at actual cost - balance due National Archives for file in Eisenmann v Durr	530.00
Actual outside service costs - in Slovenia, initial payment	2,715.00
2/20/2019 Actual outside service costs - Croatia	575.00
2/22/2019 Office copying at .15 per page 27 x 5	20.25
2/25/2019 Actual outside service costs - further payment for Slovenian service of process, by post and in person	1,375.00
3/1/2019 Office copying at .15 per page	1.80
3/12/2019 Actual outside service costs - further payment for Slovenian services in person, including review by Odvetnik Divjak	5,200.00
4/11/2019 Office copying at .15 per page 2 x 39	11.70
Office copying at .15 per page	2.70
4/12/2019 Office copying at .15 per page	0.30
4/17/2019 Office copying at .15 per page 6 x 6	5.40

Gregor Lesnik

Page 291

	<u>Amount</u>
4/17/2019 Postage and mailing at actual cost 12 x \$2.13 + \$16.39 =	41.95
4/18/2019 Office copying at .15 per page	18.00
5/31/2019 Link Translations, Translate to Polish	6,079.05
7/15/2019 Actual outside service costs	2,085.00
Revised Invoice dated 7/15/2019	
1. Formal Service of Process on Rimsa Plus Sp z.o.o. in Poland	\$695
2. Formal Service of Process on Enterprise MDM Poland Sp z.o.o. in Poland	\$695
3. Formal Service of Process on MDM Polska Sp z.o.o. in Poland	\$695
9/4/2019 Office copying at .15 per page	1.20
9/5/2019 Office copying at .15 per page	0.75
Actual outside service costs - to serve in Poland, rush personal service, by Wave Business Services dba Process Server One - \$2,960.62 + 3,933.56	6,894.18
9/23/2019 Office copying at .15 per page	0.30
9/28/2019 Reporters transcript of Case Management Conference hearing of April 2019	27.00
9/30/2019 Office copying at .15 per page	0.15
Postage and mailing at actual cost	0.55
10/28/2019 Office copying at .15 per page	2.40
10/30/2019 Office copying at .15 per page	2.40
10/31/2019 Office copying at .15 per page	1.65
11/4/2019 Office copying at .15 per page 7 x 2	2.10
Postage and mailing at actual cost	2.60
Postage and mailing at actual cost	5.10
11/5/2019 Postage and mailing at actual cost	2.13
11/14/2019 Office copying at .15 per page	34.35
11/19/2019 Office copying at .15 per page	2.25
11/23/2019 Office copying at .15 per page 4 x 49	29.40
Postage and mailing at actual cost	6.60

Gregor Lesnik

Page 292

	<u>Amount</u>
12/13/2019 to purchase laptop for Papes	500.00
1/3/2020 Travel costs- including: gas, parking, flights, rental cars, etc. CheapOAir, Gregor flights from and to Zagreb	946.65
1/8/2020 Office copying at .15 per page 4 x 4	2.40
Postage and mailing at actual cost	1.65
1/9/2020 Reporter transcript of 10-30-2019	38.70
1/12/2020 Postage and mailing at actual cost Court Reporter Lee-Anne Shortdige payment	0.55
1/13/2020 Office copying at .15 per page 4 x 54	31.20
Postage and mailing at actual cost	7.02
1/20/2020 Postage and mailing at actual cost FedEx	49.54
2/20/2020 Postage and mailing at actual cost for FedEx	34.19
2/29/2020 Office copying at .15 per page	1,957.80
3/2/2020 Postage and mailing at actual cost, includes priority mail with tracking, to all defaulted defendants	853.20
Postage and mailing at actual cost	11.00
Postage and mailing at actual cost - international postage	853.00
3/3/2020 Office copying at .15 per page 54 x 17 = 918	137.70
Postage and mailing at actual cost	294.00
3/4/2020 retainer, class action counsel, Hunter Pyle	10,000.00
3/5/2020 Office copying at .15 per page 3 x 18= 54	8.10
Office copying at .15 per page	90.00
3/19/2020 Subpoenaed records at actual cost	88.50
Subpoenaed records at actual cost, second subpoena SU 327684-02-01	88.50
3/23/2020 Subpoenaed records at actual cost - to BMW	177.00
3/24/2020 consultant services invoice, Jack B. Palmer	3,150.00

Gregor Lesnik

Page 293

	<u>Amount</u>
3/26/2020 Postage and mailing at actual cost	0.55
Postage and mailing at actual cost for FedEx	26.15
4/24/2020 Office copying at .15 per page 3 x 339=1017	152.55
Postage and mailing at actual cost for mailing overseas	185.85
5/12/2020 Office copying at .15 per page	0.30
Postage and mailing at actual cost-	0.55
5/21/2020 fees to Hunter Pyle	65,427.50
6/18/2020 Radmilo Bozinovic, translation services	7,437.50
6/22/2020 Subpoenaed records at actual cost, Titan Subpoena to BMW	88.50
8/3/2020 Luka Divjac, services for completing declaration re service	604.81
8/21/2020 Office copying at .15 per page	32.55
8/24/2020 Outside copying at actual cost, Georgia Superior Court	5.50
8/26/2020 Office copying at .15 per page	1,554.30
Postage and mailing at actual cost service of amended motions to Slovenia, Croatia, England, USA	758.58
Postage and mailing at actual cost, documents to counsel	24.30
8/27/2020 Office copying at .15 per page	165.75
9/3/2020 Radmilo Bozinovic, translation services	500.00
9/4/2020 Fibula SLB jdoo, translation services	206.50
9/18/2020 Postage and mailing at actual cost HIRD reship	58.85
Luka Divjac, represent Gregor Lesnik on petition by Vuzem in Slovenian court	3,052.00
wire fee	5.00
10/12/2020 Postage and mailing at actual cost	0.55
Radmilo Bozinovic, translations for opposition to D2N motion	312.50
2/9/2021 retainer fee to Luka Divjac for collection on anticipated judgment	12,428.54

Gregor Lesnik

Page 294

	<u>Amount</u>
3/4/2021 Postage and mailing at actual cost	107.50
4/12/2021 Office copying at .15 per page for 12 defendants at 1613 pages each	2,903.40
Postage and mailing at actual cost 15.82 x2 Domestic	31.64
5/12/2021 Office copying at .15 per page	5.10
7/22/2021 Office copying at .15 per page	1.95
8/26/2021 Office copying at .15 per page	46.80
Postage and mailing at actual cost	8.00
Postage and mailing at actual cost	87.84
Total additional charges	<u>\$184,353.93</u>
For professional services rendered	3338.35 <u>\$1,054,773.18</u>

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
William C. Dresser	1511.50	400.00	\$604,600.00
William C. Dresser	209.20	375.00	\$78,450.00
William C. Dresser	191.30	350.00	\$66,955.00
William C. Dresser	2.40	75.00	\$180.00
William C. Dresser	4.30	45.00	\$193.50
William C. Dresser	5.50	0.00	\$10,000.00
Amanda Pryzbyla	6.00	75.00	\$450.00
Amanda Pryzbyla	0.10	45.00	\$4.50
Andrea Anderson	8.00	400.00	\$3,200.00
Andrea Anderson	62.00	75.00	\$4,650.00
DebbieL nee M/earlier AnnaK/Susie/ShellyA/TiffanyS/JenG	8.50	400.00	\$3,400.00
DebbieL nee M/earlier AnnaK/Susie/ShellyA/TiffanyS/JenG	1029.20	75.00	\$77,190.00
DebbieL nee M/earlier AnnaK/Susie/ShellyA/TiffanyS/JenG	35.80	45.00	\$1,611.00
DebbieL nee M/earlier AnnaK/Susie/ShellyA/TiffanyS/JenG	0.30	0.00	\$0.00
Laura Diaz	8.20	75.00	\$615.00
Lisa Ayala	35.90	75.00	\$2,692.50
Stacie DelGiudice	205.95	75.00	\$15,446.25
Stacie DelGiudice	8.75	45.00	\$393.75
Stacie DelGiudice	0.20	0.00	\$0.00
Trish Crawford	5.05	75.00	\$378.75
Renee Wesson	0.20	45.00	\$9.00

US ex rel Lesnik v Eisenmann, et al; US Dist Ct., ND Cal. 5:16-cv-1120 BLF

EXHIBIT 752

Law Offices of William C. Dresser
 14125 Capri Drive, Suite 4
 Los Gatos, CA 95032

Invoice submitted to:
 Gregor Lesnik and Stjepan Papes

September 30, 2022

In Reference To: US ex rel Lesnik and Papes v Eisenmann, et al

Professional Services

		<u>Rate</u>	<u>Amount</u>
8/24/2022	Generate and print History Report for Court, scan, save .1 e-mail from Papes .1 Discuss with staff compiling lost income amounts and calculation of same .1 Review and revise draft of motion for judgment on FLSA cause of action 1.0 Review research re Motion for fees .1 (partially charged)	400.00/hr	560.00
	Finalize Ex. A and Ex. B for filing with Further Supplemental Declaration of Stjepan Papes in Support of Plaintiffs Amended Renewed Motions for Default Judgments 2.5 Prepare separate spreadsheet for Total Amount Due with Transportation Time and Total Amount Due Without Transportation Time 1.0	75.00/hr	262.50
8/25/2022	Prepare for hearing .1 Discuss with staff revision to spreadsheets .1 Discuss with staff calculation of underpaid wages under FLSA .1 Attend CMC .2 Make searchable History Report for Court .1 Review court website for Judge Freeman's Standing Orders	400.00/hr	1,120.00

Gregor Lesnik and Stjepan Papes

Page 2

		<u>Rate</u>	<u>Amount</u>
	.1 Prepare shell chart for fees on coerced labor claim		
	.1 Review and revise draft of motion for judgment on FLSA cause of action		
	1.0		
8/31/2022	Review calendaring of motions		40.00
	.1	400.00/hr	
9/5/2022	Review prior Orders in case, review, revise and add to draft Order granting Papes motion for judgment on FLSA cause of action		840.00
	.6	400.00/hr	
	Add to and revise draft motion for fees on Papes FLSA claim		
	1.5		
9/6/2022	Add to draft order		80.00
	.2	400.00/hr	
9/7/2022	Prepare decl in support of fees		1,600.00
	3.0	400.00/hr	
	Begin to redact portions of History Report for Court		
	1.0		
9/9/2022	Consider efficient way to redact portions of History Report for Court		40.00
	.1	400.00/hr	
9/10/2022	redact portions of History Report for Court		1,880.00
	4.5	400.00/hr	
	Add to draft declaration in support of motion for fees		
	.2		
9/11/2022	redact portions of History Report for Court		1,680.00
	4.0	400.00/hr	
	Add to declaration		
	.2		
9/12/2022	Review billing in Timeslips, prepared reports		150.00
	2	75.00/hr	
9/13/2022	Locate costs for Final Costs and saved in separate folder, prepared spreadsheet of all costs		525.00
	7	75.00/hr	
9/14/2022	Continue working on Final Costs and gathering documentation, run postage report		525.00
	7	75.00/hr	
9/15/2022	Call with Stjepan		40.00
	.1	400.00/hr	

Gregor Lesnik and Stjepan Papes

Page 4

	<u>Rate</u>	<u>Amount</u>
Review Papes declaration		
.1		
Evaluate calculation of fees		
.2		
e-mail to courtroom clerk for Judge Freeman		
.1		
Research opinions and orders granting fees		
.2		
Add to draft motion for fees		
.1		
9/26/2022 Research orders, prepare draft proposed Order on motion for fees		880.00
1.5	400.00/hr	
Memo re revisions to motion, update status memo on pleadings to complete and file		
.1		
Begin to evaluate proposed Order on motion for reconsideration		
.1		
Draft proposed Order on Administrative Motion		
.3		
Evaluate additions to declaration in support of motion for fees		
.2		
9/27/2022 Review exhibits for Memo of Costs, review, remove irrelevant, direct revisions		200.00
.2	400.00/hr	
Begin review of Timeslips History Report, prepare initial evaluation of categories of time spent and relative amount of time spent		
.3		
Continued working Final Cost, locating documents, resave and update spreadsheet		450.00
6	75.00/hr	
9/28/2022 Review Standing Order re motion for fees		1,880.00
.1	400.00/hr	
Revise text of declaration in support of motion for fees		
.3		
Review timesheets, notes re categorization, calculate totals for different categories		
3.5		
Add time and explanations to declaration in support of motion for fees		
.4		
Prepare Chart for fees		
.4		
For professional services rendered	85.30	\$18,845.00
For professional services rendered	85.30	\$18,845.00

Gregor Lesnik and Stjepan Papes

Page 5

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
William C. Dresser	38.30	400.00	\$15,320.00
Andrea Anderson	3.50	75.00	\$262.50
DebbieL nee M/earlier AnnaK/Susie/ShellyA/TiffanyS/JenG	43.50	75.00	\$3,262.50

US ex rel Lesnik v Eisenmann, et al; US Dist Ct., ND Cal. 5:16-cv-1120 BLF

EXHIBIT 753

Ex. 753 Chart of Fees by Major Tasks

Task	William Dresser	Paralegals	Outside counsel
Billing Rate	\$400 / hour	\$75	\$400
Compl. and Pre-Compl. Investigation	73	80	
Service of process	102	140	
Discovery	90	100	
Motion Practice (to dismiss, to quash, to file under seal, to amend, to extend time to serve)	180	50	
Settlement Efforts	45	3	
Client Communication	60	30	
Co-worker Communications	40	20	
Motion Practice (for default judgments)	160	60	
Miscellaneous (case management, communications with other counsel, file organization, and miscellaneous research and investigation)	70	80	
Motion for fees	18	30	
Total Hours	838	593	Not claimed

US ex rel Lesnik v Eisenmann, et al; US Dist Ct., ND Cal. 5:16-cv-1120 BLF

EXHIBIT 754

Ex. 754 Chart of Fees by FLSA Major Tasks

Task	William Dresser	Paralegals	Outside counsel
Billing Rate	\$400 / hour	\$75	\$400
Compl. and Pre-Compl. Investigation	53	60	
Service of process	102	140	
Discovery	60	20	
Motion Practice (to dismiss, to quash, to file under seal, to amend, to extend time to serve)	100	35	
Settlement Efforts	45	3	
Client Communication	60	30	
Co-worker Communications	40	20	
Motion Practice (for default judgments)	90	40	
Miscellaneous (case management, communications with other counsel, file organization, and miscellaneous research and investigation)	60	60	
Motion for fees	18	30	
Total Hours	628	438	Not claimed